

# EXHIBIT 1

CONSOLE MATTIACCI LAW, LLC  
Robert Braden v. Lockheed Martin

16,152.27	Costs
249,562.00	Fees
265,714.27	
740.80	Total hours

Bill Date	Staff	Matter	Loc	Total Dur	Rate	Description
5/23/2016	ANW	Braden, Robert K. v. Lockheed Martin	PHL	0.1		Internal conference with Danielle Buccieri, Legal Assistant and Toni Murphy, Legal Assistant
5/26/2016	ANW	Braden, Robert K. v. Lockheed Martin	PHL	1.1		Read file; prepare brief
5/26/2016	ANW	Braden, Robert K. v. Lockheed Martin	NJ	0.5		Reviewed file
5/27/2016	ANW	Braden, Robert K. v. Lockheed Martin	PHL	5		Reviewed file; prepare outline for brief
5/30/2016	ANW	Braden, Robert K. v. Lockheed Martin	Other	3.2		Reviewed file; prepare response to Defendant's brief
5/31/2016	ANW	Braden, Robert K. v. Lockheed Martin	PA	5.7		Legal research; review file; added a file from pacer to Time Matters; emailed Charlene Bates, Paralegal
6/1/2016	ANW	Braden, Robert K. v. Lockheed Martin	PHL	11		Legal research; prepare brief; email brief to Rahul Munshi, Esquire
6/6/2016	ANW	Braden, Robert K. v. Lockheed Martin	PHL	0.9		Internal conference with Rahul Munshi, Esquire
				27.5	210	5,775.00
6/25/2014	CAM	Braden, Robert K. v. Lockheed Martin	PHL	0.2		Review complaint
6/26/2014	CAM	Braden, Robert K. v. Lockheed Martin	PHL	0.3		Review complaint and comment
7/4/2014	CAM	Braden, Robert K. v. Lockheed Martin	PHL	0.3		Review and revise complaint; emails regarding same
				0.8	840	672.00
2/20/2014	CWM	Braden, Robert K. v. Lockheed Martin	NJ	0.2		Review file; e-mails with handling attorney regarding status
5/27/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.2		Review agency correspondence; update agency status
7/15/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.7		Review file; print documents; prepare & assemble trial binder and index
7/24/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.5		Review file; prepare trial binder index
7/28/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.5		Review file; update trial binder; draft correspondence to client
7/29/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.3		Review & revise correspondence to client; e-mail client
8/25/2014	CWM	Braden, Robert K. v. Lockheed Martin	PHL	0.2		E-mails with client
10/14/2015	CWM	Braden, Robert K. v. Lockheed Martin	NJ	0.2		Emails regarding deposition
10/16/2015	CWM	Braden, Robert K. v. Lockheed Martin	NJ	0.2		E-mails and telephone conference with Stephen G. Console, Esquire regarding trial
12/15/2016	CWM	Braden, Robert K. v. Lockheed Martin	NJ	0.3		Review matter; review orders and judge's procedures; review witness and exhibit lists
12/19/2016	CWM	Braden, Robert K. v. Lockheed Martin	NJ	1.2		Draft pretrial tasks list; e-mail team; update DTR; review scheduled order; prepare trial binder; internal conference with Rahul Munshi, Esquire
12/20/2016	CWM	Braden, Robert K. v. Lockheed Martin	PHL	1.8		Update trial binder index; e-mails with Rahul Munshi, Esquire; review file; create task planning list; review judges procedures
12/21/2016	CWM	Braden, Robert K. v. Lockheed Martin	NJ	2		Internal conference with Katherine Oeltjen, Esquire; e-mail Katherine Oeltjen, Esquire; internal conference with Rahul Munshi, Esquire; update trial binder and plaintiff's exhibit binder
12/22/2016	CWM	Braden, Robert K. v. Lockheed Martin	PHL	2		Update DTR with pretrial deadlines
12/28/2016	CWM	Braden, Robert K. v. Lockheed Martin	NJ	0.5		E-mails with team; set appointment; review file; internal conference with team regarding pre-trial tasks; prepare updated trial binder and index and task list; internal conference with Emily R. Derstine Friesen, Esquire regarding Motion in Limine
1/4/2017	CWM	Braden, Robert K. v. Lockheed Martin	PHL	1.8		Update trial binder index; prepare Judge's contact list; e-mails with team; update pleadings and calendar
1/5/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	1.5		Draft, review and revise pre-trial submissions and letter to judge; internal conference with Rahul Munshi, Esquire; electronic file pleadings; print and sort electronic filings; update pre-trial tasks list
1/6/2017	CWM	Braden, Robert K. v. Lockheed Martin	PHL	5		Telephone conference with Rahul Munshi, Esquire; telephone conference with court; draft letter to Judge and order; electronic filed same regarding motion in limine and exhibit and witness lists; update task list; print review and organize all new pleadings; review electronic case filings; procedural research; e-mail Emily R. Derstine Friesen regarding notice of appearance
1/9/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	3.8		Update task list; draft, review and revise pre-trial submissions infer and index; electronic file letter to Judge; draft subpoena to witness; internal conference with trial team
1/10/2017	CWM	Braden, Robert K. v. Lockheed Martin	PHL	5		Update pleadings index; review electronic case filings; draft and electronic file substitution of attorney; telephone conference with Rahul Munshi, Esquire; review plaintiff's exhibit index; update task list; e-mails with staff and team; download DVD
1/11/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	3		Prepare exhibits; update index; draft orders, tables for motion in limine responses; e-mails with team; download video depositions
1/12/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	6.8		Telephone conference with court; telephone conference with tech rep; internal conference with Emily R. Derstine Friesen, Esquire ; e-mails with team; draft, review and revise order and costs as to motion in limine; electronic file same; review procedures; update trial binder and index; print off five depositions; order trial supplies; review instructions for witnesses
1/13/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	5		

1/17/2017	CWM	Braden, Robert K. v. Lockheed Martin	PHL	7
1/18/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	7
1/19/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	7
1/20/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	14
1/23/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	10
1/24/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	9
1/25/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	9
1/26/2017	CWM	Braden, Robert K. v. Lockheed Martin	NJ	9
				<b>114.7</b>
				<b>180 20,646.00</b>

1/3/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	4.1
1/4/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.5
1/5/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	6.1
1/6/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	0.5
1/7/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	3.2
1/9/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/10/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2
1/11/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	1.9
1/12/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.3
1/13/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.7
1/15/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/16/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	5.3
1/17/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.2
1/18/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	5.7
1/19/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	5.5
1/20/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/21/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.2
1/22/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	2.8
1/23/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	10.6
1/24/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	11.1
1/25/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	15.5
1/26/2017	EDF	Braden, Robert K. v. Lockheed Martin	PHL	13.1
				<b>99.6</b>
				<b>220 21,912.00</b>

11/28/2012	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
12/4/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/5/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/6/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
12/7/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/11/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1

Review and revise organization chart; internal conference with team; internet search for witness photos; draft letter to Judge; print out defendant's trial exhibits; update binders
Trial prep
Trial prep
E-mails with opposing counsel; prepare trial exhibit binder; update indices; e-mails with team; trial preparation; defendant net worth research; travel to and attend pre-trial conference and tech run
Travel to and attend jury selection and trial day one; draft jury profile memos; e-mails with trial team; review electronic case filings; organize exhibits copies
Travel to and attend trial
Travel to and attend trial
Travel to and attend trial

Read complaint; position statement, mediation summary, depositions, file documents; discuss case and next steps with Rahul Munshi, Esquire
Read file documents; discuss case, research, and next steps with RM; discuss case with Stephen G. Console, Esquire; research verdict sheet issues; prepare research memo
Discuss case, research, and next steps with Rahul Munshi, Esquire and Stephen G. Console, Esquire; research verdict sheet issues; prepare research memo; call Opposing counsel re: pretrial prep
Read Rahul Munshi, Esquire's email to Opposing counsel re: jury instructions, voir dire, and verdict forms; discuss research and MILs with Rahul Munshi, Esquire
Read and draft response to defendant's MILs
Research and draft responses to defendant's MILs; discuss MILs and case issues with Rahul Munshi, Esquire
Research and draft responses to defendant's MILs; read and respond to Rahul Munshi, Esquire's email on witness and subpoena; research subpoena issue
Research and draft responses to defendant's MILs; read Rahul Munshi, Esquire's and Opposing counsel's emails
Research and draft responses to defendant's MILs; discuss case and MILs with Rahul Munshi, Esquire
Meet with client for prep session; discuss case and MILs with Rahul Munshi, Esquire; review and edit MILs and TOAs
Read Rahul Munshi's email to client re: direct examination
Draft letter briefs to judge for pretrial conference; read client's direct examination and witness depositions; discuss case, issues, and next steps with Rahul Munshi, Esquire; review discovery documents
Discuss case, issues, and next steps with Rahul Munshi, Esquire; review discovery documents
Discuss case, issues, and next steps with Rahul Munshi, Esquire and Stephen G. Console, Esquire; review discovery documents; meet with client trial prep
Discuss case, issues, and next steps with RM; review discovery documents; attend pre-trial conference, tech run, and mock closing
Discuss case, issues, and next steps with Rahul Munshi, Esquire; review discovery documents and prepare memos; read and respond to emails from Cheryl M. Weaver, Paralegal and Rahul Munshi, Esquire
Discuss case, issues and next steps with Rahul Munshi, Esquire; research; review documents and prepare memos; read and respond to emails from Cheryl Weaver, Paralegal and Rahul Munshi, Esquire
Research and draft Rule 50 motion script; draft pocket brief on voluntary layoff incentive program; research company's Human resources and Vice President individuals; read and respond to Rahul Munshi, Esquire's and Cheryl M. Weaver, Paralegal's emails
Trial and prep; read depositions and OWBPA list and email notes to Rahul Munshi, Esquire; discuss case and strategy with Rahul Munshi, Esquire
Trial and prep; review OWBPA list and email notes to Rahul Munshi, Esquire; discuss case and strategy with Rahul Munshi, Esquire; review D's jury instructions
Trial and prep; review OWBPA list and email notes to Rahul Munshi, Esquire; discuss case and strategy with Rahul Munshi, Esquire and Stephen G. Console, Esquire; prepare Rule 50 motion
Trial and prep; discuss case and strategy with Rahul Munshi, Esquire; prepare Rule 50 motion

Internal emails
Email with client
Internal emails
Internal emails
Emails
Emails with client

12/12/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
12/17/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/18/2012	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/20/2012	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4
1/2/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1.5
1/3/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2.2
1/4/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/7/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/8/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.8
1/9/2013	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/21/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
2/10/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4
2/11/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
2/12/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
2/25/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
2/26/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
2/27/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
3/5/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
4/11/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
5/15/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
6/5/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
6/24/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2.1
6/25/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
6/26/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
6/27/2014	JMD	Braden, Robert K. v. Lockheed Martin	PA	0.1
7/1/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
7/2/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
7/3/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
7/8/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
7/10/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
7/30/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
9/8/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
9/9/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
9/12/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
9/17/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
9/19/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
9/22/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
9/24/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
9/25/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1
9/29/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
10/3/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
10/7/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.6
10/8/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
10/9/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
10/10/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1
10/12/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4
10/14/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.7
10/15/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	2
10/31/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
11/3/2014	JMD	Braden, Robert K. v. Lockheed Martin	Other	0.1
11/10/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
11/11/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
11/12/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
11/17/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.5
11/18/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
11/21/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
11/23/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
11/24/2014	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4

Voice mails and emails with client
Email from client
Emails with client
Telephone conference with client
File review; drafting charge; e-mail to client
Telephone conference with client; drafting charge; document review
E-mail to client
Email to client
Telephone conference with client; revising charge
E-mails with client
Telephone conference with Carol A. Mager, Esquire
Telephone conference with Carol A. Mager, Esquire; e-mails with client
Left voice mail for client
Left voice mail for client; e-mail to client
E-mails with client
File review; telephone conference with client
Requesting RTS
Emails with client
Reviewing RTS; notes to file
Email with Stephen G. Console, Esquire
File review; drafting complaint; e-mail to client
E-mails with client
Revising complaint; e-mails with Carol A. Mager, Esquire
E-mails with Carol A. Mager, Esquire
Internal conference with Carol A. Mager, Esquire; emails
Revising complaint
Notices
Internal e-mails
Emails; letter to opposing counsel
E-mails with opposing counsel
Internal e-mails ; revised answer to complaint
Scheduling order
Left voice mail for client; e-mail from opposing counsel
Voice mail from/to opposing counsel; internal conference with Stephen G. Console, Esquire
Reviewing letter; e-mails with opposing counsel
Letter from opposing counsel; ECF Notice
E-mails with opposing counsel; file review
Rule 26 Telephone conference with opposing counsel; left message for client; drafting discovery plan
Rule 26 telephone conference with opposing counsel; filing plan with court
Discovery from defendant
Drafting discovery requests; e-mails with opposing counsel; left voice mail for client
E-mails with opposing counsel; telephone conference with opposing counsel
E-mails with opposing counsel
Voice mail to/from client; revising discovery requests & disclosures
File review; e-mails with Stephen G. Console, Esquire
File review; left voice mail for client
Rule 16 conference; travel; internal conference with Stephen G. Console, Esquire; left voice mail for client
Left voice mail for client
Internal e-mails
E-mail from opposing counsel
Telephone conference with opposing counsel
Telephone conference with opposing counsel
Drafting letter to court; e-mails with opposing counsel
E-mails with opposing counsel
Voice mail from opposing counsel
E-mail from client
Telephone conference with client; emails with Danielle Buccieri, Legal Assistant



11/25/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
11/26/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
12/2/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/3/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4
12/12/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
12/15/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2
12/16/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2
12/17/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
12/23/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
12/29/2014	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
1/5/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/7/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
1/22/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2
1/30/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
2/3/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
2/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1.4
2/5/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
2/6/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.2
2/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
2/16/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1
2/17/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
2/18/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4
2/18/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1
2/19/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1.7
2/20/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
3/2/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
3/3/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4
3/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
3/9/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.2
3/11/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
3/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3
3/16/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
3/18/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
3/19/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4
3/19/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
3/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
3/26/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
3/27/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
4/1/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5
4/17/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
4/9/2015	JMD	Braden, Robert K. v. Lockheed Martin	PA	0.1
4/14/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
4/20/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
4/21/2015	JMD	Braden, Robert K. v. Lockheed Martin	Other	0.1
4/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
4/24/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
5/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
5/7/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
5/8/2015	JMD	Braden, Robert K. v. Lockheed Martin	Other	0.1
5/14/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2
5/14/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.6
5/18/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
5/19/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
5/21/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1
6/1/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1
6/3/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2

Internal emails; letter from opposing counsel to Court
Email from opposing counsel with Confidentiality Order
Email from opposing counsel
Reviewing and revising Confidentiality Order; Emails with opposing counsel
Document review
Drafting discovery responses
Telephone conference with client; revising discovery responses
Emails from client; document review
File review; left voice mail for opposing counsel
Voice mail to and from opposing counsel
Left voice mail for opposing counsel; voice mail from opposing counsel
Letter from opposing counsel
Document review; responding to discovery requests
E-mails with client
Email from client
Finalizing and serving discovery responses
Email with opposing counsel
Emails with opposing counsel
Internal conference with Stephen G. Console, Esquire
Telephone conference with client; revising discovery responses; voice mail for opposing counsel
Voice mail to/from opposing counsel
telephone conference with opposing counsel
Email to client; document review; left voice mail for client; left voice mail for opposing counsel ; telephone conference with client
Emails with client; drafting discovery response
Document review; serving NODs
Order from Court; voice mail from opposing counsel
Emails with opposing counsel regarding depositions; telephone conference with opposing counsel
Revising letter to Court; emails with opposing counsel
Court order; emails to opposing counsel
Voicemail from opposing counsel
Telephone conference with opposing counsel regarding depositions
Left vm for OC (x2); voicemail from opposing counsel
Email to client
Emails with client; telephone conference with opposing counsel; emails with opposing counsel
Email to client
Emails with opposing counsel re depositions
Emails with opposing counsel
Emails with opposing counsel
Reviewing letter; emails with opposing counsel
Emails and telephone conference with opposing counsel; status call with Court
Email to client
Email from client
Emails with opposing counsel; emails with client
Emails with client re depositions
Email to client
Internal emails
Emails with client
Email from opposing counsel
Email from client
Emails re deposition
Email from client; emails with opposing counsel
Telephone conference with client; left voicemail for client; email to opposing counsel
Update case list
Email from opposing counsel
Email from opposing counsel
Email from client
Emails with client

6/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5	Telephone conference with opposing counsel; emails with client
6/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Emails with client
6/4/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Email from opposing counsel
6/8/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	Emails with opposing counsel
6/10/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.3	Telephone conference with client; telephone conference with opposing counsel; telephone conference with Danielle Buccieri, Legal Assistant
6/10/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4	Telephone conference with client; telephone conference with opposing counsel
6/11/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Letter from opposing counsel
6/16/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.4	Status conference with court
6/16/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1	Emails with opposing counsel; NODs
6/17/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	Emails with opposing counsel
6/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1	Internal emails
6/24/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	4.5	Telephone conference with client; dep prep with client; emails with opposing counsel
6/25/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	8.4	Deposition of Robert Braden
6/26/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Emails with opposing counsel
6/26/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1.2	Discovery review; telephone conference with JP Kernsian; left voicemail for Angie Cabrera
6/29/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Emails re NODs
6/29/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Emails with opposing counsel
6/29/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Scheduling order issued
6/30/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Emails with Danielle Buccieri, Legal Assistant
7/9/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Left vm for opposing counsel
7/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1	Dep prep; telephone conference with opposing counsel
7/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	Emails to opposing counsel; left vms for opposing counsel
7/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Left voicemail for opposing counsel
7/13/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1.6	Dep prep
7/14/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	6.5	Deposition of Chris Renna
7/15/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5	Internal conference with Stephen G. Console, Esquire
7/16/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	3.8	Deposition of Chris Kebalo
7/17/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.3	Telephone conference with opposing counsel
7/17/2015	JMD	Braden, Robert K. v. Lockheed Martin	NJ	0.1	Emails with opposing counsel
7/21/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Internal emails re deposition
7/21/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Email to opposing counsel
7/22/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	Emails with opposing counsel
7/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.5	Deposition prep; telephone conference with client
7/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	5.2	Deposition of Dennis Gillespie; Telephone Conference with client; dep prep
7/23/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	File review
7/24/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Letter from OC
7/24/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Email from client
7/27/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Internal emails re expert
7/28/2015	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4	Document review
9/14/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.4	Telephone conference with Rahul Munshi, Esquire
9/18/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Texts with Rahul Munshi, Esquire
9/19/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	3.9	Draft JPTM; telephone conference with Rahul Munshi, Esquire
9/29/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	1	Review and revise JPTM
10/4/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.2	Telephone conference with Rahul Munshi, Esquire
10/4/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	3.8	Emails with Rahul Munshi, Esquire
10/5/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2.7	Telephone conference with Rahul Munshi, Esquire; draft correspondence with opposing counsel; document review; revise JFPO
10/9/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Telephone conference with Stephen G. Console, Esquire
10/9/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.3	Emails with Rahul Munshi, Esquire and Kate Oeltjen, Esquire; telephone conference with Kate Oeltjen, Esquire
10/11/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	3	Review Case Documents; pretrial conference with Judge Schneider; email to Rahul Munshi, Esquire
10/12/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	0.1	Discussion with Rahul Munshi, Esquire
10/31/2016	JMD	Braden, Robert K. v. Lockheed Martin	PHL	2.5	Draft mediation statement; document review; emails with Rahul Munshi, Esquire
				<b>100.9</b>	<b>420 42,378.00</b>
10/9/2016	KCO	Braden, Robert K. v. Lockheed Martin	Other	0.1	Review and analyze correspondence from opposing counsel.
10/10/2016	KCO	Braden, Robert K. v. Lockheed Martin	NJ	0.3	Review JFPO

10/11/2016	KCO	Braden, Robert K. v. Lockheed Martin	Other	2.3
10/12/2016	KCO	Braden, Robert K. v. Lockheed Martin	Other	0.4
10/26/2016	KCO	Braden, Robert K. v. Lockheed Martin	NJ	0.2
11/2/2016	KCO	Braden, Robert K. v. Lockheed Martin	NJ	0.1
12/7/2016	KCO	Braden, Robert K. v. Lockheed Martin	NJ	0.1
				<b>3.5</b>
				<b>370 1,295.00</b>

Prepare for, travel to/from and participate in final pre-trial conference before the Hon. J. Schneider  
 Review email from JMD; draft and send email to RM; review court orders  
 Telephone conference with Judge Schneider's Chambers; review letter from opposing counsel  
 Review filing by Defendant; exchange emails with RM  
 Draft and send email to RM

5/30/2014	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
7/1/2014	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.3
7/11/2014	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
7/14/2014	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
8/7/2014	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
2/12/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.5
8/7/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
8/10/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
9/23/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
10/30/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.2
11/2/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
11/4/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
11/5/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
11/9/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
11/12/2015	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.1
1/19/2017	LCM	Braden, Robert K. v. Lockheed Martin	NJ	2.2
1/24/2017	LCM	Braden, Robert K. v. Lockheed Martin	NJ	0.2
1/26/2017	LCM	Braden, Robert K. v. Lockheed Martin	NJ	1
				<b>5.6</b>
				<b>730 4,088.00</b>

Review case list  
 Review complaint; e-mails to and from Caren N. Gurmankin, Esquire and Stephen G. Console, Esquire  
 File review  
 Review e-mails to and from Carol A. Mager, Esquire  
 Review trial binder status; e-mail to and from Cheryl M. Weaver, Paralegal  
 Internal conference with SGC regarding next steps. Review file.  
 Emails to and from Stephen G. Console, Esquire and James Duttera, Esquire regarding case status and next steps.  
 Email from James Duttera, Esquire regarding case status  
 Review ECF from court.  
 Review ECF from Court.  
 Review ECF from court.  
 Review ECF from court.  
 Review letter to court regarding scheduling.  
 Attend mock opening. Telephone conference with Stephen G. Console, Esquire. Conference with Rahul Munshi, Esquire  
 Emails to and from Stephen G. Console, Esquire regarding trial.  
 Telephone conference; email regarding verdict.

12/13/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	0.1
12/14/2016	MKB	Braden, Robert K. v. Lockheed Martin	PHL	0.1
12/15/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	0.6
12/20/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	0.1
12/21/2016	MKB	Braden, Robert K. v. Lockheed Martin	PHL	0.2
12/27/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	1.2
12/28/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	0.4
12/29/2016	MKB	Braden, Robert K. v. Lockheed Martin	NJ	4.9
1/3/2017	MKB	Braden, Robert K. v. Lockheed Martin	NJ	1.1
1/4/2017	MKB	Braden, Robert K. v. Lockheed Martin	PHL	2.4
				<b>11.1</b>
				<b>340 3,774.00</b>

Internal conference with Stephen G. Console, Esquire regarding trial team  
 Email correspondence with Rahul Munshi, Esquire regarding trial prep  
 Confer with Charlene Bates, Paralegal regarding EOA; Start review of file for trial prep  
 Confer with CWM and RM regarding trial preparation  
 Email correspondence with CWM regarding trial prep; Review trial prep list  
 Trial preparation  
 Trial prep  
 Trial prep  
 Confer with RM regarding trial prep and motions in limine; Prepare statement chart for motion in limine  
 Work on statements to exclude for motions in limine; meet with Rahul Munshi, Esquire and Emily Derstine Friesen, Esquire regarding trial preparation and transitioning work

9/22/2015	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.3
11/16/2015	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.6
11/16/2015	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.2
6/5/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	5
6/6/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	2
7/29/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.5
9/7/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	2
9/19/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	4
9/21/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.5
10/3/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.5
10/5/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	3
10/18/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	1
10/19/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.5
10/20/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	0.5
11/28/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	1
11/29/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	1
11/30/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	4

Internal conference with James M. Duttera, Esquire  
 Revised letters to court; review SJ Motion  
 Telephone conference with Court; e-mail note to file  
 Drafted response to motion for reconsideration  
 Revised response to motion for reconsideration  
 Telephone conference with client  
 Telephone conference and emails with James Duttera, Esquire; telephone conference and emails with opposing counsel; drafted letter to court; file review  
 Drafted JFPTO; emails with James Duttera, Esquire  
 Telephone conference with client  
 Review JFPTO from opposing counsel; email with James Duttera, Esquire  
 Revisions to JFPTO; prep for Final pretrial conference  
 Revised JFPTO and filed; email with client; prep for settlement conference  
 Email with client; email with opposing counsel  
 Drafted letters to court; email with client  
 Prep for settlement conference; email with client  
 Prep for settlement conference  
 Internal conference with client; prep for settlement conference



12/1/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	1
12/2/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	2
12/5/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	6
12/13/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	4
12/14/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	6
12/15/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	3
12/16/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	2
12/19/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	5
12/20/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	6
12/21/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	5
12/22/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	6
12/23/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	5
12/30/2016	RM	Braden, Robert K. v. Lockheed Martin	PHL	4
1/3/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	6
1/4/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	9.5
1/5/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/6/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/10/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	8
1/11/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	8
1/12/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/13/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/14/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	7
1/15/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	7
1/16/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	11
1/17/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	11
1/18/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	12
1/19/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	11
1/20/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/21/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/22/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	10
1/23/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	17
1/24/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	16
1/25/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	19.5
1/26/2017	RM	Braden, Robert K. v. Lockheed Martin	PHL	12
				306.6
				420 128,772.00

Emails with client; prep for settlement conference	
Prep for settlement conference	
Settlement conference and prep for settlement conference	
Trial prep	
Trial prep	
Trial prep; drafted letter to court	
Prepared for trial	
Prep for trial	
Prep for trial	
Prep for trial	
Prep for trial; internal conference with Megan K. Baine, Esquire	
Internal conference with client; prep for settlement conference	
Prep for trial; internal conference with Emily Derstine Friesen, Esquire	
Trial prep; internal conference with Emily Derstine Friesen, Esquire; email with opposing counsel	
Trial prep; internal conference with Emily Derstine Friesen, Esquire; telephone conference with opposing counsel	
Trial prep; emails with opposing counsel; internal conference with Emily Derstine Friesen, Esquire	
Trial prep	
Trial prep; telephone conference with client	
Trial prep; telephone conference with client	
Trial prep; drafted MIL responses; internal conference with client	
Trial prep	
Trial prep	
Trial prep	
Trial prep	
Trial prep	
Trial prep	
Trial and prep	
Trial and prep	
Trial and trial prep	
Trial and trial prep	
Initial Consultation	
Telephone conference with James M. Duttera, Esquire	
Internal conference with James M. Duttera, Esquire; telephone conference with Caro A. Mager, Esquire	
File review; telephone conference with Robert Braden; internal conference with Nancy Glace, Legal Assistant - No charge	
File review; e-mail to Anna Oppenheim, Esquire, Nancy Glace, Legal Assistant	
E-mail to/from client and James M. Duttera, Esquire	
E-mail from James M. Duttera, Esquire; e-mail to Carol A. Mager, Esquire	
E-mail from Cheryl M. Weaver, Paralegal	
Internal conference with Laura C. Mattiacci, Esquire	
Internal conference with James M. Duttera, Esquire	
File review; e-mail to James M. Duttera, Esquire	
Internal conference with James M. Duttera, Esquire	
Internal conference with James M. Duttera, Esquire	
File review; e-mail to attorneys	
Telephone conference with Cheryl M. Weaver, Paralegal	
File review	
Review e-mails	
Review filing by James M. Duttera, Esquire	
Internal conference with Rahul Munshi, Esquire	
Internal conference with Rahul Munshi, Esquire	
Internal conference with Rahul Munshi, Esquire	



11/30/2016	SGC	Braden, Robert K. v. Lockheed Martin	PHL	1
12/5/2016	SGC	Braden, Robert K. v. Lockheed Martin	NJ	2
12/16/2016	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.2
12/16/2016	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.2
1/4/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/5/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.6
1/11/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.2
1/18/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.1
1/18/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.3
1/19/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	1.5
1/23/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.3
1/24/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	0.6
1/25/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	1.5
1/26/2017	SGC	Braden, Robert K. v. Lockheed Martin	PHL	1
				<b>16.5</b>
				<b>900 14,850.00</b>

Internal conference with Rahul Munshi, Esquire and client; prepare for settlement conference  
 Prepare for and attend settlement conference  
 Review court notices  
 E-mail from court  
 Internal conference with Emily Derstine Friesen, Esquire  
 Internal conference with Rahul Munshi, Esquire and Emily Derstine Friesen, Esquire  
 Review court notice  
 Internal conference with Emily Derstine Friesen, Esquire  
 Internal conference with Rahul Munshi, Esquire and Emily Derstine Friesen, Esquire  
 Rahul Munshi, Esquire closing; internal conference with Rahul Munshi, Esquire  
 E-mails regarding trial  
 Telephone conferences with Cheryl M. Weaver, Paralegal and Rahul Munshi, Esquire  
 Discuss case and strategy with Rahul Munshi, Esquire and Emily Derstine Friesen, Esquire  
 Telephone conferences with Rahul Munshi, Esquire, etc.

1/19/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	7
1/20/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	7
1/23/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	10
1/24/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	10
1/25/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	10
1/26/2017	CB	Braden, Robert K. v. Lockheed Martin	PHL	10
				<b>54.00</b>
				<b>100 5,400.00</b>

Trial Prep  
 Trial Prep  
 Attended trial and trial prep  
 Attended trial and trial prep  
 Attended trial and trial prep  
 Attended trial and trial prep

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

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**ROBERT BRADEN,**

**Plaintiff,**

**v.**

**LOCKHEED MARTIN CORPORATION:**

**Defendant.**

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**CIVIL ACTION NO. 14-4215-RMB-JS**

**DECLARATION OF STEPHEN G. CONSOLE IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Stephen G. Console, make the following Declaration in support of Plaintiff Robert Braden's Motion for Attorneys' Fees and Costs in the above-captioned matter.

1. I make this Declaration upon my personal knowledge and a review of the file in this case.
2. I am the founder and principal attorney of Console Mattiacci Law, LLC ("CML") – formerly known as Console Law Offices LLC - and I am authorized to make this Declaration.
3. I am a graduate of Drew University (B.A. 1979) and Villanova Law School (J.D. 1982).
4. I have been admitted to practice law in Pennsylvania since 1982 and in New Jersey since 1983, and am admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania; the United States District Court for the Middle District of Pennsylvania; the United States District Court for the District of New Jersey; and the United States Court of Appeals for the Third Circuit.
5. Since 1985, I have concentrated my practice on employment law, and have handled thousands of employment law cases as counsel for the employee.
6. I am an elected fellow of the College of Labor and Employment Lawyers (2008).



7. Martindale-Hubbell has recognized me as an “AV Rated” Attorney – the highest possible peer review rating in legal ability and ethical standards.

8. From 1988 through 2000, I was a member of the Executive Board of Directors of the National Employment Lawyers Association of New Jersey.

9. I regularly speak at seminars involving employment law and have done so for more than twenty (20) years.

10. I have been recognized by my peers as a top practitioner. Without limitation: I was named as a leading attorney in the state of Pennsylvania in the area of plaintiff’s employment and labor law in *Chambers USA: America’s Leading Business Lawyers 2005-2006*, as one of the Best Lawyers in America (2008-2014) in the area of Labor and Employment Law in *Best Lawyers in America*, as one of the Best Lawyers in *The Best of the U.S.* (2008-2013), and as one of the Best Lawyers in America in *America’s Who’s Who*. I was named the Best Lawyers’ 2012 Philadelphia Employment Law – Individuals Lawyer of the Year. I was named to the “Top 100 Attorneys in Philadelphia” and “Top 100 Attorneys in Pennsylvania” by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* from 2008-present.

11. I established CML in 1990. For more than 26 years, the firm has specialized in representing non-union employees in all aspects of workplace matters, including discrimination and retaliation cases. The firm is included among the Martindale-Hubbell Bar Register of Preeminent Lawyers, which is exclusive to AV Preeminent Attorneys – those who have achieved the highest possible peer review rating in both legal ability and ethical standards.

12. CML is dedicated to providing outstanding representation to its clients. The firm's current legal staff is made up of ten attorneys and six paralegals/legal assistants. Work is allocated in a way so as to ensure excellent representation in an efficient manner.

13. I oversee each case and offer input especially into its initial assessment, trial strategy and settlement negotiations. Each case is staffed with an attorney to handle it on a day to day basis through resolution; the level of experience of the attorney assigned depends on several factors, including the complexity of the case. If it is necessary to try a case in court, the firm devotes great resources to what is considered in today's legal world to be an unusual event requiring unique talents and specialized skills. Throughout the representation, less experienced associates and law clerks are often called upon to research issues; paralegals and legal assistants perform vital tasks such as communicating with the administrative agency, keeping and organizing the file, and helping prepare the visual presentation at trial.

14. CML's case staffing according to particular skills *works*. The firm has achieved a high level of success and a great demand for its services. In my many years of experience, I have found that this method of staffing is necessary to advocate for clients at the highest level and achieve the reputation and success that our firm has. I believe that it has enabled our firm to take on and commit to litigating to verdict against resource-rich defendants cases that many plaintiff's lawyers cannot.

15. I allocated the work on this case to ensure the excellent representation of Plaintiff in an efficient way.

16. I consulted with Plaintiff in August 2012, at which time I assessed the strength of his case and determined an appropriate course of action. A copy of the contingency fee agreement between Plaintiff and CML is attached to the present Motion as Exhibit 11. After deciding to file an EEOC Charge of discrimination, I assigned the case to associate James Duttera.

17. From August 2, 2012 through verdict, I performed 16.5 hours of work on this case for which Plaintiff seeks reimbursement. I kept abreast of and oversaw Plaintiff's case through its

entirety. Among other things, I attended the settlement conference in this action, formulated a settlement demand, reviewed important correspondence and filings, and communicated and strategized with the handling attorneys throughout the representation. Moreover, I had significant experience in litigating matters against Defendant, and its predecessor, General Electric Company (Aerospace). I was well aware of the methodology used by Defendant to evaluate employees, encourage older workers to leave the work force, and Defendant's process of job terminations. I had previously tried to verdict the age discrimination case of *Garden v. General Elec.*, Civil Action No. 3:91-cv-01204 (D.N.J.) before the Honorable Clarkson S. Fisher in 1992, resulting in the award of compensatory damages, liquidated damages, and punitive damages of close to \$1,000,000.

18. Mr. Duttera was the primary attorney working on this case from when our firm filed an EEOC Charge on Plaintiff's behalf in January 2013 and through the summary judgment phase of litigation. He is an experienced litigator who vigorously prosecuted Plaintiff's claim of age discrimination. Among other things, Mr. Duttera conducted comprehensive discovery, drafted Plaintiff's Response in Opposition to Defendant's Motion for Summary Judgment, and developed the extensive and varied facts necessary to demonstrate pretext in a reduction in force action. He navigated a litigation that was hard fought at every turn and opposed successfully Defendant's Motion for Summary Judgment. Mr. Duttera is currently a Deputy Attorney General at the New Jersey Office of Attorney General.

19. Rahul Munshi was the primary attorney working on this case from May 2016 through trial. Mr. Munshi focused intensively on the pre-trial submissions and trial of Plaintiff's case. He is an experienced litigator who has served as second chair in numerous trials brought by CML. Mr. Munshi mastered the varied and many facts of this case, and worked extensively on



trial preparation, including giving a mock closing to all members of CML weeks before the trial commenced.

20. Emily Derstine Friesen helped Mr. Munshi present this matter to the jury and worked extensively on trial preparation in January 2017. Ms. Derstine Friesen (first-year attorney) conducted legal research on Defendant's Motions in Limine, mid-trial motion, and various evidentiary issues. Ms. Derstine Friesen also provided legal research in support of Plaintiff's proposed jury instructions and jury verdict sheet. Moreover, Ms. Derstine Friesen was a vital asset at the trial itself in organizing the voluminous documentation and supporting Mr. Munshi in the presentation of the case to the jury.

21. Valuable contributions to the prosecution of this case were also made by attorneys Laura Mattiacci, Kate Oeltjen, Carol Mager, Ashley Waring, and Megan Balne. Paralegals Cheryl Weaver and Charlene Bates also provided significant support that contributed to the overall success in this matter. Ms. Weaver has been a paralegal at CML since the firm's inception in 1990. Ms. Weaver, among other things: helped organize the file; tracked corporate research documents; prepared trial binders of information in summary form prepared in anticipation of litigation and trial; conducted internet research; assisted in filings; and helped in trial preparation and presentation. Ms. Bates, who has worked at CML as a paralegal since 2008, assisted in trial preparation, helped present Plaintiff's case at trial, and was tasked with controlling Plaintiff's visual presentation to the jury. The itemized entries for Mr. Duttera, Mr. Munshi, Ms. Derstine Friesen, Ms. Waring, Ms. Balne, Ms. Oeltjen, Ms. Mattiacci, Ms. Mager, Ms. Weaver, and Ms. Bates are set forth in Exhibit 1. Valuable contributions were also made by legal assistants whose time has not been recorded. Among other things, they helped maintain the file and assisted in the electronic filing of various documents in this matter.

22. It was the policy of CML for its attorneys and paralegals to keep contemporaneous records of time spent on behalf of clients of the firm. The time entries for myself and others who worked on the case have been reduced to a computer printout format, attached as Exhibit 1 to Plaintiff's Motion. CML has exercised billing judgment by deleting some entries so that Exhibit 1 reflects only the time for which Plaintiff seeks reimbursement. Where the billing entries reflect an overlap of attorney time, that is reflective of a collaborative effort. Exhibit 1 does not include time spent working on the case after the verdict was rendered, including time spent on the instant Motion and other post-trial matters. I have reviewed the itemized entries for my time as reflected in Exhibit 1 and they are accurate.

23. From the inception of this case through the jury verdict in Plaintiff's favor on January 26, 2017, CML performed 740.8 hours of services for which reimbursement is sought, resulting in a lodestar amount of \$249,562.00. Hours worked and rates for services performed are summarized below:

<b>Name</b>	<b>Year began as professional/ paraprofessional</b>	<b>Hours Worked</b>	<b>Hourly Rate</b>	<b>Lodestar Amount</b>
Stephen G. Console, Shareholder	1982	16.5	\$900	\$14,850
Laura C. Mattiacci, Shareholder	2002	5.6	\$730	\$4,088
Rahul Munshi, Associate	2009	306.6	\$420	\$128,772
James Duttera, Associate	2005	100.9	\$420	\$42,378
Emily Derstine Friesen, Associate	2016	99.6	\$220	\$21,912
Ashley Waring, Associate	2015	27.5	\$210	\$5,775
Megan Balne, Associate	2010	11.1	\$340	\$3,774

Kate Oeltjen, Associate	2005	3.5	\$370	\$1,295
Carol Mager, Partner	1973	.8	\$840	\$672
Cheryl Weaver, Paralegal	1990	114.7	\$180	\$20,646
Charlene Bates, Paralegal	2008	54	\$100	\$5,400
<b>Total</b>		<b>740.80</b>		<b>\$249,562</b>

24. In my professional opinion, all of the work performed by CML was reasonable and necessary to the successful prosecution of this case and the favorable verdict reached.

25. The hourly rates for the attorneys and paralegals at CML as reflected in the billing entries (Exhibit 1 to the Motion) and summarized in the above chart are the same as the regular rates charged for their services at that time in non-contingent matters. No upward adjustment in billing rate was made, notwithstanding the contingency and risk of the matters involved, the opposition encountered, the preclusion of other employment, and other factors present in this action which would justify a higher rate of compensation.

26. The usual and customary hourly rates used in the calculation of CML's lodestar are the actual rates CML has used to bill the clients it represents on an hourly fee basis, and which have been paid by hourly clients. In fact, CML bills about \$500,000 annually on an hourly fee basis at its usual and customary rates. Stated differently, the market rates of CML are created by the market of what clients do in fact pay to retain the firm.

27. CML's usual and customary rates have been approved by arbitrators and courts in awarding fees to our firm.

In 2014, CML submitted a fee petition in the matter of *Sessions v. Owens-Illinois, Inc.*, a class action pension benefits case in the United States District Court for the Middle District of Pennsylvania (C.A. No. 1:07-cv-1669). The fee petition for a negotiated portion of the common



fund set forth a lodestar check based on CML's usual and customary rates and referenced in particular my work and billing rate. By Order dated October 23, 2014 (Docket No. 283), the Honorable Robert Mariani approved the requested fee based, in part, upon a cross check of the percentage of recovery based fee against the lodestar method.

In 2008, CML submitted declarations setting forth its usual and customary rates in support of plaintiffs' petition for attorneys' fees and costs in a race discrimination case. Chief United States Magistrate Judge Rueter awarded the attorneys' fees and found that the CML's rates (including for myself) were "reasonable billing rates for federal employment-related matters" in the Philadelphia area and in accordance with the prevailing market rates. *See Marthers v. Gonzalez*, Civil Action No. 05-cv-3778, Docket No. 81 (E.D. Pa. August 13, 2008).

In 2007, an arbitrator awarded fees to CML as the prevailing party on a multi-claimant WPCL and ERISA case based on CML's usual and customary rates charged to its clients. (*Aaron, et al. v. ACE.*) Defendant's counsel did not contest the reasonableness of CML's hourly rates. In 2005, an arbitrator awarded CML its attorney's fees based on its usual and customary hourly rates. (*Bolton v. LINA.*) In that case, defendant's counsel did not contest the reasonableness of CLO's hourly rates.

In 1999, CLO submitted a fee petition in the matter of *Feret v. First Union Corp.* based on its usual and customary hourly rates. The petition was approved (although, as agreed, the award was in an amount negotiated as part of the aggregate class settlement). *See Feret v. First Union Corp.*, Civil Action No. 2:97-cv-06759, Docket No. 104 (E.D. Pa. August 16, 1999).

The Honorable Clarkson S. Fisher of the United States District Court for the District of New Jersey awarded attorney's fees based on CML's usual and customary rates as the prevailing party at trial in an age discrimination case. *See Garden v. General Elec.*, Civil Action No. 3:91-

cv-01204, Docket No. 55 (D.N.J. June 7, 1993). CML was also awarded attorneys' fees as the prevailing party in discrimination cases based on its usual and customary rates in *Plumley v. Harbor Linen*, Civil Action No. 1:88-cv-01557 (D.N.J.) and *Bronstein v. Harbor Services*, Civil Action No. 1:88-cv-05074 (D.N.J.).

28. I am familiar with the rates charged by other attorneys with backgrounds similar to mine, as well as to the attorneys within CML who worked on this matter. Based on my personal knowledge, the rates that were utilized by CML in calculating its lodestar in this case are within the prevailing market rates for similar work performed by attorneys of comparable skills and experience.

29. The costs and expenses incurred and paid by CML in connection with this case were reflected on the books and records of the firm. These books and records were prepared from checks and expense vouchers that were regularly maintained by the firm in the ordinary course of business and accurately reflect the costs and expenses incurred. A printout of the detailed, individualized billing entries is attached as Exhibit 10 to Plaintiff's Motion. CML has incurred \$16,152.27 in costs through January 26, 2017 in pursuing this action on behalf of Plaintiff. Those costs are summarized as follows:

<b>Category</b>	<b>Cost Incurred</b>
Delivery	\$613.79
Filings	\$550.00
Legal Research	\$434.13
Deposition Travel	\$44.92
Deposition Transcripts and Video	\$4,889.30
Trial Transcripts	\$4,371.99
Trial IT Support	\$4,262.50
Miscellaneous Trial Expenses (meals, parking, tolls, etc.)	\$985.64
<b>TOTAL</b>	<b>\$16,152.27</b>


In my professional opinion, these costs were reasonably incurred in the prosecution of this litigation.

30. In my professional opinion, the attorneys' fees and costs requested by Plaintiff's Motion are fair, reasonable and fully consistent with the purpose of the fee-shifting provisions contained in anti-discrimination statutes, including the ADEA and NJLAD.

31. Further, there is substantial risk of taking plaintiff's employment cases on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiff's lawyers cannot take on representation and devote the necessary time and money to be able to successfully litigate these cases to verdict against experienced defense counsel, such as counsel in this case.

I understand the foregoing Declaration is made subject to the penalties of 28 U.S.C. §1746 relating to unsworn falsification to authorities.

Dated: 3/8/17

  
\_\_\_\_\_  
Stephen G. Console



# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

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**ROBERT BRADEN,**

**Plaintiff,**

**v.**

**LOCKHEED MARTIN CORPORATION:**

**Defendant.**

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**CIVIL ACTION NO. 14-4215-RMB-JS**

**DECLARATION OF RAHUL MUNSHI IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Rahul Munshi, make the following Declaration in support of Plaintiff Robert Braden's Motion for Attorneys' Fees and Costs in the above-captioned matter.

1. I make this Declaration upon my personal knowledge and a review of the file in this case.
2. I am an associate of Console Mattiacci Law, LLC ("CML") – formerly known as Console Law Offices LLC - and I am authorized to make this Declaration.
3. I am a graduate of Haverford College (B.A. 2006) and the Beasley School of Law at Temple University (J.D. 2009).
4. While at the Beasley School of Law at Temple University, I was a standout member of the National Trial Team, Jessup International Law Moot Court Team, and served as Managing Editor of the *Temple Political & Civil Rights Law Review*.
5. I have practiced law since 2009, and my first position out of law school was serving as a judicial law clerk for the Hon. Joel H. Slomsky of the United States District Court for the Eastern District of Pennsylvania (2009-2010).

6. Since joining CML in 2010, I have devoted my practice to the representation of employees. I have since that time represented employees in all matters of employment law, from counseling, representation at the administrative agency, negotiation of settlements, litigation in state and federal courts, and at trial.

7. I have second-chaired numerous employment law trials as an Associate at CML. In 2013, I served as co-counsel in the case of *Pietrowski v. The Kintock Group* (Philadelphia Court of Common Pleas, C.A. No. 111003328), which resulted in a jury verdict of \$1,678,000.00 - the largest employment law verdict in Pennsylvania for that year, as reported in *The Legal Intelligencer*. At the *Pietrowski* trial, I presented plaintiff's opening statement and conducted several trial examinations, including the direct examination of the plaintiff.

8. Additionally, in 2016, I successfully argued before the Court of Appeals for the Third Circuit in *McClain v. Avis* (Case No. 15-1936), where we obtained reversal of summary judgment in a race discrimination action.

9. I have spoken frequently at seminars and conferences on employment law and litigation. In 2013, I served as an instructor at the Pennsylvania Bar Institute (PBI) Employment Law Institute on a panel regarding evidence in age discrimination actions. In 2014, I served as an instructor at the PBI Employment Law Institute on a seminar called "Trial of a Retaliation Case," where I represented a fictional plaintiff in a mock trial before several hundred seminar participants. In 2015, I served as a panelist and moderator at the Philadelphia Bar Association's Bench-Bar and Annual Conference, where I led a discussion on LGBT discrimination in the workplace. In 2016, I served as an instructor at the PBI Employment Law Institute on a course regarding age discrimination litigation. In April 2017, I will again serve as an instructor at the PBI Employment Law Institute on a seminar regarding employee protections under the

Americans with Disabilities Act. Finally, I am a frequent guest speaker on legal and political issues at Haverford College, Temple University, and Drexel University.

10. I have been recognized by my peers as a top practitioner. Without limitation: I have been named a “Rising Star” on the “Super Lawyers” list by *Philadelphia Magazine* and *Philadelphia Super Lawyers Magazine* every year since 2013; I was named to the “2016 Lawyers on the Fast Track” by *The Legal Intelligencer*, a distinction given to only 35 lawyers under the age of 40; and I was the 2012 recipient of the Young Alumni Award for Excellence in Leadership by Haverford College.

11. Over my eight plus years practicing law, I have represented hundreds of clients and have, under the supervision of Stephen G. Console, litigated through successful resolution scores of cases.

12. I have been the primary attorney working on this case starting in May 2016 and I served as lead trial counsel. I focused intensively on the pre-trial submissions and trial in Plaintiff’s case.

13. This case has been challenging and vigorously prosecuted. As with every discrimination case, it is difficult to prove intent. An ADEA claim is particularly challenging as a plaintiff must prove that age was the determinative factor in the adverse action. Further, demonstrating pretext in a reduction in force action where there are facially neutral criteria requires extensive factual investigation and discovery. Plaintiff’s case involved presentation of complicated business plans and corporate documents, such as PowerPoint presentations and corporate strategies riddled with business jargon. Further adding to the challenges to the presentation of this case were the unusually large amount of documentation, the many levels of cover-up employed by Defendant to hide the discriminatory animus at play, and the large and sophisticated employer/Defendant.

14. This case has been hard fought. Among other things, Plaintiff successfully opposed Defendant's Motion for Summary Judgment and Defendant's subsequent Motion for Reconsideration on the Court's Summary Judgment opinion and Order.

15. I devoted the time and attention to the development and prosecution of Plaintiff's case as I believed in my experience and professional opinion to be necessary to achieve its successful result.

16. From the outset of litigation through the jury verdict date of January 26, 2017, I performed 306.6 hours of work on this case for which Plaintiff seeks reimbursement. In summary and without limitation, I:

- prepared for, and participated in, conferences with the Court;
- selected and prepared the exhibits for trial;
- helped prepare Plaintiff for his trial testimony;
- communicated with counsel for Defendant;
- attended a settlement conference on behalf of Plaintiff;
- strategized with Stephen G. Console and the trial team;
- worked closely with CML staff regarding necessary preparations for trial;
- drafted Plaintiff's portion of the Joint Final Pretrial Order;
- reviewed Defendant's trial exhibit list;
- reviewed Defendant's trial exhibits;
- compiled Plaintiff's trial exhibit list and exhibits;
- prepared and conducted cross-examination of five (5) live witnesses at trial;
- prepared and conducted direct examination of Plaintiff;
- prepared and presented Plaintiff's opening statement and closing argument;



- created PowerPoint presentations for opening statement and closing argument;
- worked on final preparations for trial;
- conducted legal research in support of motions and in opposition to motions by Defendant;
- drafted proposed Voir Dire questions for the jury;
- drafted and conducted legal research on jury instructions;
- drafted and conducted legal research on the jury verdict form; and
- tried the four day trial to a highly successful verdict.

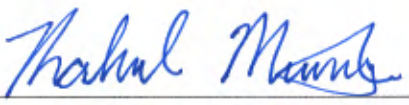
17. In accordance with CML's policy, I recorded on a contemporaneous basis the time I spent working on Plaintiff's case. I have reviewed the itemized entries for my time on this case as reflected on Exhibit 1 and they are accurate.

18. I have also reviewed the other entries on Exhibit 1 and I believe that they are accurate.

19. I have reviewed the costs and expenses reflected in Exhibit 10 to Plaintiff's Motion and summarized in the chart set forth in the Motion and I believe that they are accurate.

I understand the foregoing Declaration is made subject to the penalties of 28 U.S.C. §1746 relating to unsworn falsification to authorities.

Dated: 3/8/17

  
Rahul Munshi

# EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

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**ROBERT BRADEN,**

**Plaintiff,**

**v.**

**LOCKHEED MARTIN CORPORATION:**

**Defendant.**

---

**CIVIL ACTION NO. 14-4215-RMB-JS**

**DECLARATION OF ALICE W. BALLARD**

I, Alice W. Ballard, make the following Declaration in support of the application of Steven G. Console and Rahul Munshi for an award of counsel fees in this case.

1. I am the sole shareholder in the Law Office of Alice W. Ballard, P.C. and have been licensed to practice law in the Commonwealth of Pennsylvania since 1974. A copy of my resume with a full list of my bar admissions is attached as Exhibit A.

2. I am an active member of the National Employment Lawyers Association (NELA), the country's largest professional organization that is exclusively comprised of lawyers who represent employees in cases involving employment rights.

3. As my resume shows, I frequently present at NELA's Annual Conventions on a variety of topics. But I spend more of my time and resources working with members of our local NELA chapter than I do on my work for National NELA. As a senior member of our local chapter, I offer much advice and support to our members, and I frequently consult with them on their applications for fee awards in cases where they have been successful at trial. As of January 1, 2017, these rates fall between \$215 per hour for inexperienced attorneys to \$900 per hour for attorneys of the highest level of experience and reputation.

4. An individual attorney's rate depends on a number of factors, including his or her experience, level of skill, reputation, business acumen, and the overall impact that he or she has had on the success of the community of plaintiff-side employment lawyers, often by way of having won substantial victories or settlements that demonstrate that the cases brought by the plaintiffs' bar must be taken seriously.

5. I am familiar with Mr. Console's qualifications on all of the factors I have listed above. I consult with him when I need his expertise, and I have attended many of his excellent CLE seminars.

6. Regarding Mr. Console:

- His experience is broad and deep. Not only has he been in practice for many years, he has been a leading attorney in the field for most of that time.
- His level of skill is outstanding. He is a master at preparing his cases from the very start, often compiling much of the evidence he needs through extensive investigation at the administrative level. He is skilled at organizing and gaining the cooperation of other employees who can help his own client – a skill that many lawyers in our field lack. He is often able to obtain substantial settlements even before his cases are filed in court.
- His reputation is evident by the many inclusions, rankings, and honors conferred on him by external evaluators. He shares his knowledge freely at the many CLEs where he serves as a presenter.
- He is an excellent manager of his professional practice. Given the size of his firm, he is able to assign different tasks to attorneys with different skills and experience, which results in an efficient use of his own time on any given

matter.

- But above all, Mr. Console and his firm have made a major and long-lasting contribution to the community of plaintiff-side employment lawyers through their many successful case outcomes. They have set a high bar that inspires others and gives lasting credibility to the practice as a whole.

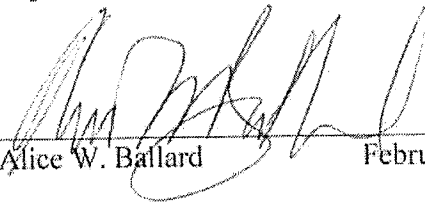
7. I attest without hesitation that Mr. Console's requested hourly rate of \$900 per hour is fully appropriate in this market. Because of the factors listed above, he deserves a rate that places him at an exceptionally high level.

8. I attest without hesitation that Mr. Munshi's requested hourly rate of \$420 per hour is fully appropriate in this market. I am aware that Mr. Munshi is an associate attorney with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law.

9. I am familiar with the difficulties and challenges of prevailing on an age discrimination claim, particularly one involving a termination in connection with a restructuring/reduction in force. Few firms in this area are willing to take on such a case and commit to bring it to verdict on a contingent basis.



The foregoing facts are true to the best of my knowledge and information. I make this Declaration in full contemplation of the penalties and pains of perjury.

 2/23/17  
\_\_\_\_\_  
Alice W. Ballard February 23, 2017

# **EXHIBIT 4-A**

Alice W. Ballard  
Law Office of Alice W. Ballard, P.C.  
123 South Broad Street, Suite 2135  
Philadelphia, PA 19109  
Telephone: (215) 893-9708  
Fax: (215) 893-9997  
e-mail: [awballard@awballard.com](mailto:awballard@awballard.com)  
[www.awballard.com](http://www.awballard.com)  
(rev'd. December, 2015)

Education: BA Harvard 1970  
JD Harvard 1973

Teaching Experience:

University of Pennsylvania Law School

Adjunct Lecturer 2000-2002  
Appellate Advocacy

Adjunct Lecturer 1978-1979  
Trial of an Issue of Fact

Villanova Law School

Adjunct Professor 1985-1988  
Employment Discrimination

Litigation Experience

I have tried roughly 18 cases, including two class actions, to verdict or judgment as lead or co-lead counsel. I have handled roughly 20 cases in the federal appeals courts, most of them as lead counsel. I have resolved hundreds of cases through arbitration, mediation or litigation and settlement.

Some of the larger or more notable cases I have handled include:

*Francis X. Dougherty et al. v. School District of Philadelphia, et al.* (E.D. Pa 2:12-cv-1001) (co-counsel with Lisa A. Mathewson). Verdict obtained against School District and Estate of Arlene Ackerman in First Amendment retaliation case that was closely followed by the press as a matter of interest to the public, resulting in eight newspaper reports and comments, including:

[http://www.philly.com/philly/education/20150318\\_Jury\\_says\\_Philadelphia\\_district\\_violated\\_ex-officials\\_right\\_to\\_free\\_speech.html](http://www.philly.com/philly/education/20150318_Jury_says_Philadelphia_district_violated_ex-officials_right_to_free_speech.html)

*Dickerson, et al v. U.S. Steel, et al*, 439 F. Supp. 55 (E.D. Pa 1977); 582 F. 2d 827 (3<sup>rd</sup> Cir. 1978); 472 F. Supp. 1304 (E.D. Pa. 1978); and 23 FEP Cases 1088 (E.D. Pa. 1980). This was a class action on behalf of black employees at U.S. Steel's Fairless Works, alleging race discrimination in various employment practices, including initial assignments, selection for trade and craft positions using paper-and-pencil tests, and promotion to management. After a 94-day trial, the District Court issued a decision in favor of the plaintiff class on the management and trade and craft claims. After interlocutory appeal on a collateral issue, the determination of back pay for the class as a whole, and Stage II hearings for roughly five class members, the parties agreed on a mediated settlement for approximately 700 black employees.

*Miller v. CIGNA Corp.*, 47 F. 3d 586 (3<sup>d</sup> Cir. 1995) (*en banc*). This was an age discrimination case establishing that the burden of proof in an individual claim is that age be a "determinative factor", not the "sole cause", of the discrimination.

*Masterson v. LaBrum and Doak*, 876 F. Supp. 1224 (E.D. Pa. 1993). This was a sex discrimination case involving failure to promote an associate to partnership. This was the first instance of a court award in which a law firm was ordered to promote an associate to partnership as a remedy for employment discrimination.

*Stepnowski and Webster v. Hercules Corporation and Pension Plan of Hercules, Inc.*, E.D. Pa. Civil Action Nos. 04-2296 and 05-6404 (as co-counsel with Robert LaRocca and Joshua Snyder). This was an ERISA class action alleging unlawful reduction of the pension benefits of roughly 2200 Hercules retirees. On March 30, 2007, the Court approved an \$18 million settlement on behalf of the class.

*David Lewis (and six others) v. City of Philadelphia*, Pennsylvania Human Relations Commission Case Number 200505979 (as co-counsel with Arthur Bugay and Norman Matlock). This was a group action challenging a City practice that automatically disqualified any firefighter applicant who was over the age of 40. On January 26, 2009, the PHRC ruled in the Complainants' favor. The City declined to appeal. The complainants are now working successfully as firefighters.

### Contract Negotiations

I regularly represent executives and professionals in negotiations involving compensation agreements, partnership disputes, and other work-related contracts or issues.

Professional and CLE Presentations (selected)

December, 2015	Speaker at American Law Institute CLE annual course: Employment Law: Essentials and Best Practices
November, 2015	ABA Section of Labor and Employment 9 <sup>th</sup> Annual Convention: McDonnell-Douglas: Benefit for Employee-Plaintiffs in Summary Judgment Practice
June, 2014	National Employment Lawyers Association 25 <sup>th</sup> Annual Convention: “The New Restatement of Employment Law: Its Strengths, Weaknesses, and Ambiguities” (plenary session) (to be repeated in June, 2016)
April, 2014	Pennsylvania Bar Institute: Employment Law Institute: Title VII Milestones, 1964-2014
June, 2013	Pennsylvania Bar Institute: Litigating Employment Discrimination Claims: “The Year in Review”
June, 2013	National Employment Lawyers Association 24 <sup>th</sup> Annual Convention: “Bias 2.0 and Summary Judgment” (plenary session)
October, 2012	National Employment Lawyers Association Regional Conference: “Appellate Decisions on the Mental Processes of Discrimination – Finding Room for Implicit Bias as a Factor in Causation”
June, 2012	National Employment Lawyers Association 23 <sup>rd</sup> Annual Convention: “The Ties That Bind: Offensive and Defensive Navigation Through Restrictive Covenants” (moderator)
November, 2010	National Association of Employment Lawyers Webinar: “Overcoming Problem Doctrines in Summary Judgment Litigation.
June, 2010	National Employment Lawyers Association 21 <sup>st</sup> Annual Convention: “Summary Judgment: Some Problem Doctrines”



October, 2009	National Employment Lawyers Association Regional Conference: “Surviving Summary Judgment in Employment Litigation”
July, 2008	National Employment Lawyers Association 19 <sup>th</sup> Annual Convention: “Hip-Pocket Cases for Every Employment Lawyer”
April, 2008	Pennsylvania Bar Institute: Employment Law Institute: Attacking Mandatory Arbitration Programs
December, 2007	Pennsylvania Bar Institute: Litigating Employment Discrimination Claims: “The Year in Review”
November, 2007	ABA Labor and Employment Law Section Continuing Legal Education Conference Panelist: Voir Dire and Jury Selection
June, 2007	Eastern District of Pennsylvania 2007 Federal Bench Bar Conference Panelist: “The Third Circuit’s Model Civil Jury Instructions and Their Impact on Charging Conferences”
December, 2005	Pennsylvania Bar Institute: Litigating Employment Discrimination Claims: “The Year in Review”
June, 2004	National Employment Lawyers Association 15 <sup>th</sup> Annual Convention: “Avoiding Legal Malpractice for the Plaintiff’s Employment Lawyer”
December, 2003	Pennsylvania Bar Institute: Litigating Employment Discrimination claims: “The Year in Review”
December, 2002	Pennsylvania Bar Institute: “Workplace Investigation of Sexual Harassment Claims”
June, 2002	National Employment Lawyers’ Association 13 <sup>th</sup> Annual Convention: “Cross-Examination: the Building Blocks of Your Closing Speech”

February, 2002	National Association of Women Lawyers' Mid-Year Meeting: "Gender Bias in Law Firms - Where Are We Now?"
September, 2001	Federal Mediation and Conciliation Service 23 <sup>rd</sup> Arbitration Symposium: "Employee Relations After <i>Circuit City</i> "
August, 2001	American Bar Association Annual Meeting Section of Labor and Employment Law: "Deposition Techniques That Work"
May, 2001	Georgetown University Law Center Continuing Legal Education Employment Law and Litigation Institute: "Summary Judgment: A Tool for Plaintiffs"
June, 2000	National Employment Lawyers Association 11 <sup>th</sup> Annual Convention: "Effective Appellate Advocacy".
May, 2000	Minnesota State Bar Association 17 <sup>th</sup> Annual Upper Midwest Employment Law Institute: "The Plaintiff Stars Speak: Strategies for Avoiding Summary Judgment and Preparing for Trial".
October, 1999	Third Circuit Judicial Conference Panelist: "Judges and Lawyers: What We Expect From Each Other."

#### Expert Witness Experience

I have served as an expert in four professional negligence cases.

1. In Ronald and Yvonne Price v. Richard J. Silverberg, Esquire, et al., CCP, Phila. County; March Term, 1997; No. 446, the plaintiffs alleged that Mr. Silverberg's representation of them in an employment discrimination case was deficient. I was an expert for the defendant.

2. In Tirpak v. Yurchak, CCP, Carbon County, No. 97-1188, the plaintiff alleged that Mr. Yurchak's handling of her wrongful discharge and her appeal from the denial of her disability benefit claim was negligent. I was an expert for the plaintiff.
3. In Nicholas v. Lisko, CCP, Centre County, No. 320 1997, the plaintiff alleged that Mr. Lisko's handling of his appeal to a faculty committee from the termination of his employment as a tenured professor at Penn State was negligent. I was an expert for the plaintiff.
4. In Nettles v. Booth & Tucker, CCP, Philadelphia County, June 2005 No. 1495, the plaintiff alleged that the defendant law firm was negligent in its failure to file a timely charge of discrimination on her behalf at the EEOC. I was an expert for the plaintiff.

Professional Service:

Adviser for American Law Institute's Restatement (Third) of Employment Law (now being developed): 2002-present

National Employment Lawyers Association: Member, National Litigation Strategy Task Force

Participant in Judge Baylson's annual training seminar for new law clerks: 2006 - 2009

Participant in Advisory Committee on Rules of Practice and Procedure Mini-Conference on Proposed Changes to Civil Rule 56: 2007

Employment law consultant to Pennsylvania Courts project to revise Pennsylvania Standard Jury Instructions: 2006

Third Circuit Task Force on Rule 11: 1989-1990

E.D. Pa. Civil Justice Reform Act Expense and Delay Reduction Plan Advisory Committee: 1991-1998

Volunteer Mediator, E.D. Pa. Court-Annexed Mediation Program: 1992-present

Volunteer Arbitrator, E.D. Pa Court-Annexed Arbitration program 1990-present

Professional Organization Memberships

American Law Institute (life member)  
National Employment Lawyers Association  
American Bar Association  
Philadelphia Bar Association

Professional Recognition

Listed in Best Lawyers in America (Labor and Employment)  
1997 through present

Listed in Pennsylvania SuperLawyers (including Top 100 in Philadelphia)  
2006 through present

Listed in U.S. News Best Lawyers (Employment)

Listed in Philadelphia Magazine Top 50 Lawyers in Pennsylvania (Employment  
Law)

Community and Charitable Activities

Chestnut Hill Community Orchestra, President: 1990-2004

Schuylkill River Greenway Association, Secretary: 2002-2006

Convener of Schuylkill RiverSwim Advisory Committee: 2005-present

Women for the WaterWorks Committee: 2005-2008

# EXHIBIT 5



IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY

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ROBERT BRADEN,

Plaintiff,

v.

LOCKHEED MARTIN CORPORATION:

Defendant.

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CIVIL ACTION NO. 14-4215-RMB-JS

**DECLARATION OF ROBERT A. DAVITCH, ESQUIRE**

1. I, Robert A. Davitch, Esquire, make this declaration in support the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1976 graduate of Temple University (now Beasley) School of Law. I have been admitted to practice in Pennsylvania since 1976. I am also admitted to practice before the United States District Court for the Eastern District of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

3. I am a principal and the vice-president of Sidkoff, Pincus & Green, P.C. Sidkoff, Pincus & Green ("SPG") (actually its predecessor) was founded in 1958 and is one of the oldest law firms of its size in Philadelphia.

4. SPG is regularly involved in trial and litigation matters in federal and state courts, as well as before administrative agencies, and in front of arbitrators and mediators. For many years, I have concentrated my practice in the areas of employment and civil rights litigation, as well as contractual disputes, whistleblower claims, and personal injury claims that involve serious or catastrophic injuries.

5. Through my work, I am aware of the rates charged by employment attorneys in the Philadelphia market.

6. I am personally aware of the credentials and skills of Stephen G. Console, Esquire and Rahul Munshi, Esquire.

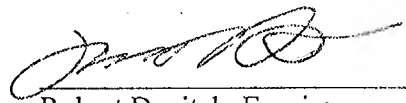
7. I am aware that Mr. Console is the founder, and has been a shareholder of the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. I am also aware that since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on employment litigation. I also know that Mr.

Console's background and professional experience includes a multitude of significant cases that have resulted in verdicts and decisions favorable to his clients. I know that he has handled approximately 2,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty (20) years. I am very aware of his stellar reputation in the relevant legal community. I have also worked with him as co-counsel in a number of cases and was able to personally observe his superior skills as an employment lawyer. Mr. Console's requested rate of \$900 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

9. I am aware that Mr. Munshi is an associate attorney with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Through my interactions, I have been able to observe his excellent skills as an employment lawyer. Ms. Munshi's requested rate of \$420 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

10. There is a substantial risk in taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers will not take on representation or agree to devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the State of New Jersey that the foregoing is true and correct to the best of my knowledge and information.



Robert Davitch, Esquire  
Sidkoff, Pincus & Green, P.C.  
2700 Aramark Tower  
1101 Market Street  
Philadelphia, PA 19107

DATED: February 20, 2017

# EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY

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ROBERT BRADEN,

Plaintiff,

v.

LOCKHEED MARTIN CORPORATION:

Defendant.

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CIVIL ACTION NO. 14-4215-RMB-JS

**DECLARATION OF ALAN H. SCHORR, ESQUIRE**

1. I, Alan H. Schorr, Esquire, make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1993 graduate of Widener University School of Law. I have been admitted to practice in Pennsylvania since 1993. I am also admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the District of New Jersey.

3. I established Schorr & Associates, P.C., in 1993. I have achieved high value settlements and verdicts on behalf of employees who have suffered from discrimination, harassment, retaliation, and other work-related problems. I am also a civil mediator, trained by the New Jersey Association of Professional mediators, and I am on the New Jersey Court list of approved mediators.

4. My practice, as well as that of the law firm, is exclusively concentrated in the representation of employees in all aspects of employment related litigation.

5. I am aware of the credentials and skills of Stephen G. Console, Esquire and Rahul Munshi, Esquire having co-counseled cases with them and/or their law firm in the past and also having referred cases to them and their law firm.

6. I am aware that Mr. Console is the founder and has been a shareholder in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes a multitude of significant cases that resulted in verdicts and appellate discussions favorable to his clients. He has handled approximately 2,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done

so for over twenty (20) years. Mr. Console's requested rate of \$900 per hour is reasonable for work in fee shifting cases by experienced trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers of his level of experience in this field.

7. I am aware that Mr. Munshi is an associate attorney with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Ms. Munshi's requested rate of \$420 per hour is reasonable for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

8. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the State of New Jersey that the foregoing is true and correct to the best of my knowledge and information.

A handwritten signature in black ink, appearing to read 'Alan Schorr', is written over a horizontal line.

Alan Schorr, Esquire  
Schorr & Associates, P.C.  
5 Split Rock Drive  
Cherry Hill, NJ 08003

DATED: February 20, 2017

# **EXHIBIT 7**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

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**ROBERT BRADEN,**

**Plaintiff,**

**v.**

**LOCKHEED MARTIN CORPORATION:**

**Defendant.**

---

**CIVIL ACTION NO. 14-4215-RMB-JS**

**DECLARATION OF SIDNEY L. GOLD, ESQUIRE**

1. I, Sidney L. Gold, Esquire, make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1972 graduate of Temple University. I have been admitted to practice in Pennsylvania since 1975. I am also admitted to practice before the following federal courts: the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court.

3. I am the principal shareholder of the Philadelphia law firm Sidney Gold & Associates, P.C., which has been recognized by the Martindale-Hubbell Bar Register as a preeminent law firm in the field of employment law and civil rights litigation.

4. My practice, as well as that of the law firm, is exclusively concentrated in the representation of both employees and employers in all aspects of employment related litigation.

5. I am aware of the credentials and skills of Stephen G. Console, Esquire and Rahul Munshi, Esquire having co-counseled cases with them and/or their law firm in the past and also having referred cases to them and their law firm.

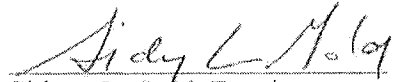
6. I am aware that Mr. Console is the founder and has been a shareholder in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes a multitude of significant cases that resulted in verdicts and appellate discussions favorable to his clients. He has handled approximately 2,000 employment law cases as counsel for the employee. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty (20) years. Mr. Console's requested rate of \$900 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by experienced trial counsel with similar backgrounds and abilities in this field and is reasonable in light of the local market for lawyers of his level of experience in this field.



7. I am aware that Mr. Munshi is an associate attorney with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. Through my interactions, I have been able to observe his excellent skills as an employment litigator. Ms. Munshi's requested rate of \$420 per hour is reasonable because it lies well within the range of fees charged for work in fee shifting cases by trial counsel with similar backgrounds, abilities and experience in this field, and is reasonable in light of the local market for lawyers of his level of experience in this field.

8. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the State of New Jersey that the foregoing is true and correct to the best of my knowledge and information.

  
Sidney L. Gold, Esquire  
Sidney L. Gold & Associates, P.C.  
1835 Market Street, Ste. 515  
Philadelphia, PA 19103

DATED: February 20, 2017

# EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

**ROBERT BRADEN,**

Plaintiff,

V.

**LOCKHEED MARTIN CORPORATION:**

**Defendant.**

**CIVIL ACTION NO. 14-4215-RMB-JS**

**DECLARATION OF JOE H. TUCKER, JR., ESQUIRE**

1. I, Joe H. Tucker, Jr., make this declaration in support of the Motion of Plaintiff for an award of attorneys' fees and costs in the above-captioned matter.

2. I am a 1984 graduate of Howard University, and a 1989 graduate of Temple University School of Law. I am “AV” rated by Martindale-Hubbell, and I have been recognized as a Philadelphia “Super Lawyer” and a Top 100 Pennsylvania Lawyer. I was a Finalist for the Inaugural Arlen Specter Award (presented by *The Legal Intelligencer* to the attorney or judge who in the past 10 years who has done the most to promote the law, the legal profession or the cause of justice in Pennsylvania.) I am a Fellow of the International Academy of Trial Lawyers, and a member of National Association of Distinguished Counsel – Nation’s Top One Percent. I am also an instructor in Trial Advocacy at the University of Pennsylvania Law School. I have presented the Edward J. Ross Lecturer in Litigation at Temple Law School. I am also admitted to practice before the following courts: the United States District Court for the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the Western District of Pennsylvania, the United States Court of Appeals for the Third Circuit, the Commonwealth of Pennsylvania, and the United States Supreme Court.

3. I have lectured both locally and nationally on employment discrimination and trial advocacy.

4. I am the Shareholder and Managing Partner of Tucker Law Group ("TLG"), a thirteen (12) lawyer trial firm with offices in Philadelphia, PA, Marlton, NJ and Miramar FL.

5. TLG is regularly involved in both plaintiff and defense employment litigation. I have tried to jury verdict numerous employment discrimination cases in both federal and state courts. My practice is concentrated in the areas of employment litigation and other complex civil and commercial litigation matters. I have presented CLEs locally and nationally on employment discrimination cases and the trial of such cases.

6. I am aware of the credentials and skills of Stephen G. Console, Esquire and Rahul Munshi, Esquire, having litigated cases against them and/or their law firm in the past (for more than ten (13) years). I have also referred many employment discrimination cases to them and their law firm.

7. To my understanding, I have litigated against and or tried to jury verdict employment discrimination cases against every major plaintiff's employment lawyer and law firm in this legal community.

8. Without fear of contradiction, it is my opinion that Mr. Console, Mr. Munshi and their law firm are the preeminent plaintiffs' employment lawyers and law firm in this legal community.

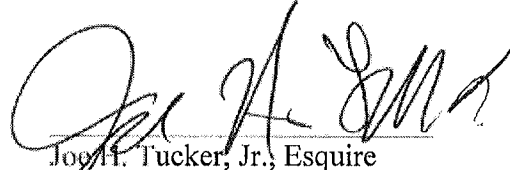
9. I am aware that Mr. Console is the founder and has been a shareholder in the firm of Console Mattiacci Law, LLC (previously called Console Law Offices LLC) in Philadelphia, PA since 1990. Since 1985, Mr. Console has concentrated his practice in all aspects of employment law, with a special focus on litigation. Mr. Console's background includes handling significant cases that resulted in verdicts and appellate decisions favorable to his clients. In addition, he regularly speaks at seminars involving employment law and has done so for over twenty (20) years. Mr. Console is considered one of the most formidable attorneys in the Third Circuit. He commands respect within the defense employment bar because of his record and his reputation. I have sought advice from Mr. Console regarding my firm's plaintiff employment cases. Mr. Console's experience, and abilities in the employment field in the area are relied upon by me when I make the recommendation to refer potential clients to him. I also consider his experience and abilities when I am advising my clients as to whether to settle or take a matter to trial.

10. I am aware that Mr. Munshi is an associate attorney with Console Mattiacci Law, LLC. I am also aware that he is a 2006 graduate of Haverford College, a 2009 graduate of The Beasley School of Law at Temple University, and that he joined Console Mattiacci Law, LLC in 2010 after completing a federal judicial clerkship with the Hon. Joel H. Slomsky of the District Court for the Eastern District of Pennsylvania. I am aware that he has significant experience in representing clients in employment cases and that he regularly speaks at seminars involving employment law. I have litigated against Mr. Munshi, and through my interactions, I have been able to observe his excellent skills as an employment litigator, including his persistence in obtaining the discovery that was needed for successful prosecution of those cases. Mr. Munshi and I have opposed each other in depositions, motions and other pre-trial matters. I have found him to always prepared and knowledgeable of the specific subject matter.

11. There is a substantial risk of taking a plaintiff's employment case on a straight contingency fee basis. The risk to the plaintiff's firm is so substantial that many plaintiffs' lawyers cannot take on representation and devote the necessary time to be able to successfully litigate these cases to verdict against experienced defense counsel. I have personally experienced that Mr. Console accepts that risk and devotes all the necessary time, effort and skill to zealously represent their clients. Specifically, I have litigated against Mr. Console and Mr. Munshi in matters where they represent plaintiffs on a contingent fee basis.

12. I have not received compensation for the execution of this declaration or any other benefit. To my understanding, I have never received any fees from Mr. Console or his firm for any matter that I may have referred to his firm and I have never maintained a record of any matter that I have ever referred to Mr. Console or his law firm.

I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania that the foregoing is true and correct to the best of my knowledge and information.

A handwritten signature in black ink, appearing to read "Joe H. Tucker, Jr.", is written over a horizontal line.

Joseph H. Tucker, Jr., Esquire

Tucker Law Group

Ten Penn Center

1801 Market Street, Suite 2500

Philadelphia, PA 19103

DATED: February 14, 2017

# EXHIBIT 9

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Year	Firm Name	Location	Average FTE Attorneys	Partner Billing Rate High	Partner Billing Rate Low	Partner Billing Rate Avg	Perman Billing Rate High	Associate Billing Rate High	Associate Billing Rate Low	Associate Billing Rate Avg	Counsel Low	Counsel High	NLJ Billing Source	Notes
2013	Adams and Reese	New Orleans, LA	277	\$650.00	\$275.00	\$300.00	\$300.00	\$322.00	\$200.00	\$250.00	\$405.00	\$500.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Akerman Senterfitt	Miami, FL	502	\$610.00	\$350.00	\$480.00	\$425.00	\$175.00	\$300.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Akin Gump Strauss Hauer & Feld	Washington, DC	806	\$1220.00	\$615.00	\$755.00	\$680.00	\$365.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Allen Matkins Leck Gamble Mallory & Natisis	Los Angeles, CA	187	\$680.00	\$225.00	\$615.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Alston & Bird	Atlanta, GA	805	\$875.00	\$465.00	\$675.00	\$575.00	\$280.00	\$425.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Andrews Kurth	Houston, TX	348	\$1050.00	\$745.00	\$890.00	\$1080.00	\$265.00	\$670.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Archer & Greiner	Haddonfield, NJ	208	\$460.00	\$330.00	\$400.00	\$295.00	\$200.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Arent Fox	Washington, DC	323	\$860.00	\$500.00	\$650.00	\$595.00	\$275.00	\$395.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Arnall Golden Gregory	Atlanta, GA	139	\$520.00	\$430.00	\$480.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Arnold & Porter	Washington, DC	748	\$950.00	\$670.00	\$815.00	\$610.00	\$345.00	\$500.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013	Arnstein & Lehr	Chicago, IL	141	\$585.00	\$350.00	\$465.00	\$350.00	\$175.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350



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2013 Baker & Hostetler	Cleveland, OH	810	\$685.00	\$250.00	\$450.00	\$455.00	\$120.00	\$250.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Baker & McKenzie	Chicago, IL	4004	\$1130.00	\$260.00	\$755.00	\$925.00	\$100.00	\$395.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Baker, Donelson, Bearman, Caldwell & Berkowitz	Memphis, Tenn.	587	\$495.00	\$340.00	\$400.00	\$465.00	\$245.00	\$295.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Ballard Spahr	Philadelphia, PA	479	\$650.00	\$395.00	\$475.00	\$495.00	\$235.00	\$315.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Barnes & Thornburg	Indianapolis, IN	487	\$580.00	\$330.00	\$480.00	\$370.00	\$260.00	\$320.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Benesch, Friedlander, Coplan & Aronoff	Cleveland, OH	150	\$635.00	\$360.00	\$455.00	\$475.00	\$155.00	\$280.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Best Best & Krieger	Riverside, CA	175	\$655.00	\$340.00	\$455.00	\$365.00	\$235.00	\$280.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Bingham McCutchen	Boston, MA	900	\$1080.00	\$220.00	\$795.00	\$605.00	\$185.00	\$450.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Blank Rome	Philadelphia, PA	471	\$940.00	\$445.00	\$640.00	\$565.00	\$175.00	\$350.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Bond, Schoenck & King	Syracuse, NY	194	\$520.00	\$240.00	\$355.00	\$285.00	\$160.00	\$225.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Bowles Rice	Charleston, WV	128	\$285.00	\$165.00	\$230.00	\$180.00	\$115.00	\$135.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Bracewell & Giuliani	Houston, TX	432	\$1125.00	\$575.00	\$760.00	\$700.00	\$215.00	\$440.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Bradley Arant Boult Cummings	Birmingham, AL	336	\$605.00	\$325.00	\$430.00	\$340.00	\$200.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Broad and Cassel	Orlando, FL	169	\$465.00	\$285.00	\$360.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Brownstein Hyatt Farber Schreck	Denver, CO	216	\$700.00	\$310.00	\$520.00	\$345.00	\$285.00	\$395.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Bryan Cave	St. Louis, MO	980	\$860.00	\$405.00	\$590.00	\$570.00	\$210.00	\$405.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Buchalter Nemer	Los Angeles, CA	134	\$695.00	\$475.00	\$605.00	\$375.00	\$350.00	\$365.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Burr & Forman	Birmingham, AL	249	\$525.00	\$240.00	\$355.00	\$350.00	\$200.00	\$245.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Butzel Long	Bloomfield Hills, MI	125	\$535.00	\$350.00	\$440.00	\$415.00	\$215.00	\$305.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Cadwalader, Wickersham & Taft	New York, NY	435	\$1050.00	\$800.00	\$630.00	\$750.00	\$395.00	\$605.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Carlton Fields	Tampa, FL	276	\$840.00	\$455.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Connell Foley	Roseland, NJ	121	\$575.00	\$275.00	\$425.00	\$325.00	\$200.00	\$255.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Cooley	Palo Alto, CA	632	\$990.00	\$660.00	\$820.00	\$630.00	\$160.00	\$525.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Covington & Burling	Washington, DC	738	\$890.00	\$605.00	\$760.00	\$565.00	\$320.00	\$415.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

888-770-5647  
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2013 Cox Smith Matthews	San Antonio, TX	117	\$595.00	\$395.00	\$505.00	\$485.00	\$230.00	\$320.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Cozen O'Connor	Philadelphia, PA	509	\$1080.00	\$300.00	\$555.00	\$590.00	\$235.00	\$345.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Curtis, Mallet-Prevost, Colt & Mosle	New York, NY	322	\$860.00	\$730.00	\$800.00	\$785.00	\$345.00	\$480.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Davis Graham & Stubbs	Denver, CO	146	\$695.00	\$350.00	\$435.00	\$340.00	\$190.00	\$245.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Davis Polk & Wardwell	New York, NY	787	\$985.00	\$650.00	\$875.00	\$975.00	\$130.00	\$615.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Debevoise & Plimpton	New York, NY	615	\$1075.00	\$655.00	\$1055.00	\$760.00	\$120.00	\$480.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dechert	New York, NY	800	\$1095.00	\$670.00	\$990.00	\$735.00	\$385.00	\$530.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dentons			\$1050.00	\$345.00	\$700.00	\$685.00	\$210.00	\$425.00	National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dickstein Shapiro	Washington, DC	538	\$1250.00	\$560.00	\$750.00	\$585.00	\$510.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Dinsmore & Shohl	Cincinnati, OH	422	\$650.00	\$250.00	\$400.00	\$350.00	\$140.00	\$235.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 DLA Piper	New York, NY	4035	\$1025.00	\$450.00	\$765.00	\$750.00	\$260.00	\$510.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Dorsey & Whitney	Minneapolis, MN	517	\$565.00	\$340.00	\$435.00	\$510.00	\$215.00	\$315.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Duane Morris	Philadelphia, PA	613	\$710.00	\$430.00	\$520.00	\$480.00	\$295.00	\$370.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Edwards Wildman Palmer	Boston, MA	572	\$765.00	\$210.00	\$535.00	\$415.00	\$245.00	\$325.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Faegre Baker Daniels	Minneapolis, MN	683	\$580.00	\$355.00	\$455.00	\$315.00	\$110.00	\$260.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Foley & Lardner	Milwaukee, WI	872	\$660.00	\$405.00	\$600.00	\$470.00	\$270.00	\$335.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Foley Hoag	Boston, MA	223	\$775.00	\$590.00	\$670.00	\$385.00	\$290.00	\$325.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Fox Rothschild	Philadelphia, PA	490	\$750.00	\$335.00	\$550.00	\$300.00	\$245.00	\$310.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Fried, Frank, Harris, Shriver New York, & Jacobson	New York, NY	476	\$1100.00	\$830.00	\$1000.00	\$760.00	\$375.00	\$985.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gardere Wynne Sewell	Dallas, TX	223	\$775.00	\$430.00	\$535.00	\$445.00	\$265.00	\$310.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gibbons	Newark, NJ	210	\$865.00	\$440.00	\$560.00	\$475.00	\$295.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gibson, Dunn & Crutcher	New York, NY	1086	\$1800.00	\$755.00	\$980.00	\$830.00	\$775.00	\$550.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Gordon & Rees	San Francisco, CA	457	\$475.00	\$375.00	\$420.00	\$325.00	\$285.00	\$300.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Greenberg Traurig	New York, NY	1699	\$655.00	\$360.00	\$555.00	\$565.00	\$200.00	\$390.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Harris Beach	Rochester, NY	204	\$600.00	\$295.00	\$385.00	\$235.00	\$175.00	\$395.00	\$500.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Harter Secrest & Emery	Rochester, NY	136	\$465.00	\$300.00	\$385.00	\$290.00	\$165.00	\$250.00	\$380.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Haynes and Boone	Dallas, TX	489	\$1020.00	\$450.00	\$670.00	\$580.00	\$310.00	\$405.00	\$940.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Hogan Lovells	Washington, DC	2280	\$1000.00	\$705.00	\$935.00				National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Holland & Hart	Denver, CO	409	\$725.00	\$285.00	\$435.00	\$415.00	\$165.00	\$275.00	\$595.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Holland & Knight	Washington, DC	926	\$1035.00	\$335.00	\$555.00	\$575.00	\$210.00	\$325.00	\$775.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Honigman Miller Schwartz and Cohn	Detroit, MI	227	\$660.00	\$280.00	\$390.00	\$225.00	\$205.00	\$220.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Hughes Hubbard & Reed	New York, NY	344	\$995.00	\$725.00	\$680.00	\$675.00	\$365.00	\$555.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Husch Blackwell	St. Louis, MO	514	\$625.00	\$235.00	\$430.00	\$465.00	\$180.00	\$260.00	\$600.00 National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Ice Miller	Indianapolis, IN	301	\$530.00	\$335.00	\$460.00	\$305.00	\$245.00	\$270.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Irell & Manella	Los Angeles, CA	164	\$975.00	\$800.00	\$890.00	\$750.00	\$395.00	\$535.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Jackson Kelly	Charleston, WV	200	\$370.00	\$175.00	\$290.00	\$265.00	\$145.00	\$195.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jackson Lewis	Los Angeles, CA	590	\$440.00	\$310.00	\$580.00	\$315.00	\$275.00	\$250.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jackson Walker	Dallas, TX	328	\$550.00	\$450.00	\$500.00	\$385.00	\$255.00	\$335.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jaffer, Mangels, Butler & Mitchell	Los Angeles, CA	126	\$875.00	\$560.00	\$650.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jenner & Block	Chicago, IL	492	\$925.00	\$565.00	\$745.00	\$650.00	\$380.00	\$455.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jones Day	New York, NY	2353	\$975.00	\$445.00	\$745.00	\$775.00	\$205.00	\$435.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Jones Walker	New Orleans, LA	361	\$425.00	\$275.00	\$385.00	\$240.00	\$200.00	\$225.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kasowitz, Benson, Torres & Friedman	New York, NY	365	\$1165.00	\$600.00	\$935.00	\$625.00	\$200.00	\$340.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Katten Muchin Rosenman	Chicago, IL	566	\$745.00	\$500.00	\$515.00	\$555.00	\$340.00	\$405.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kaye Scholer	New York, NY	414	\$1080.00	\$715.00	\$860.00	\$680.00	\$320.00	\$510.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kelley Drye & Warren	New York, NY	298	\$815.00	\$435.00	\$540.00	\$500.00	\$305.00	\$430.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Kipatrick Townsend & Stockton	Atlanta, GA	552	\$775.00	\$400.00	\$550.00	\$475.00	\$315.00	\$385.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 King & Spalding	Atlanta, GA	838	\$995.00	\$545.00	\$775.00	\$735.00	\$125.00	\$460.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Kirkland & Ellis	Chicago, IL	1517	\$595.00	\$590.00	\$825.00	\$715.00	\$235.00	\$540.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Knobbe, Martens, Olson & Bear	Irvine, CA	266	\$765.00	\$440.00	\$555.00	\$535.00	\$295.00	\$345.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Kramer Levin Naftalis & Frankel	New York, NY	320	\$1025.00	\$740.00	\$845.00	\$750.00	\$400.00	\$990.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Lane Powell	Seattle, WA	172	\$465.00	\$365.00	\$430.00	\$330.00	\$225.00	\$265.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Latham & Watkins	New York, NY	2033	\$1110.00	\$895.00	\$960.00	\$725.00	\$465.00	\$605.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Lathrop & Gage	Kansas City, MO	286	\$700.00	\$285.00	\$420.00	\$375.00	\$195.00	\$250.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Leonard, Street and Dehard	Minneapolis, MN	184	\$490.00	\$295.00	\$405.00	\$305.00	\$265.00	\$285.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Lewis Roca Rothgerber			\$695.00	\$380.00	\$555.00	\$525.00	\$205.00	\$400.00	National Law Journal, December 2013	published in April 2013. Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Lindquist & Vennum	Minneapolis, MN	181	\$600.00	\$460.00	\$520.00	\$470.00	\$275.00	\$365.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350.
2013 Littler Mendelson	San Francisco, CA	909	\$815.00	\$355.00	\$550.00	\$420.00	\$245.00	\$290.00	National Law Journal, December 2013	published in April 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Lowenstein Sandler	Roseland, NJ	254	\$755.00	\$510.00	\$615.00	\$850.00	\$280.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Manatt, Phelps & Phillips	Los Angeles, CA	325	\$795.00	\$640.00	\$740.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McCarter & English	Newark, NJ	373	\$625.00	\$450.00	\$550.00	\$370.00	\$220.00	\$300.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McDermott Will & Emery	Chicago, IL	1024	\$835.00	\$525.00	\$770.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McElroy, Deutsch, Mulvaney & Carpenter	Morrisstown, NJ	288	\$505.00	\$325.00	\$440.00	\$325.00	\$200.00	\$295.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McGuireWoods	Richmond, VA	941	\$725.00	\$450.00	\$595.00	\$325.00	\$285.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 McKenna Long & Aldridge	Atlanta, GA	509	\$850.00	\$480.00	\$530.00	\$425.00	\$375.00	\$395.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Michael Best & Friedrich	Milwaukee, WI	198	\$850.00	\$260.00	\$445.00	\$350.00	\$190.00	\$275.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Miles & Stockbridge	Baltimore, MD	207	\$725.00	\$330.00	\$470.00	\$375.00	\$230.00	\$285.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Miller & Martin	Chattanooga, TN	133	\$565.00	\$245.00	\$385.00	\$270.00	\$160.00	\$215.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Morgan, Lewis & Bockius	Philadelphia, PA	1334	\$765.00	\$430.00	\$620.00	\$585.00	\$270.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Morris, Manning & Martin	Atlanta, GA	142	\$575.00	\$400.00	\$480.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Morrison & Foerster	San Francisco, CA	1010	\$1195.00	\$585.00	\$865.00	\$725.00	\$220.00	\$525.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Nixon Peabody	Boston, MA	612	\$850.00	\$295.00	\$520.00	\$550.00	\$180.00	\$300.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Norton Rose Fulbright			\$500.00	\$525.00	\$775.00	\$515.00	\$300.00	\$400.00	National Law Journal, December 2013	Location and Average FTE Attorneys' data not available due to merger in 2013. Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Nutter McClennen & Fish	Boston, MA	135	\$715.00	\$470.00	\$575.00	\$460.00	\$205.00	\$375.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 O'Melveny & Myers	Los Angeles, CA	738	\$950.00	\$915.00	\$715.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Orrick, Herrington & Sutcliffe	San Francisco, CA	977	\$945.00	\$505.00	\$625.00	\$675.00	\$170.00	\$310.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Parker Poe Adams & Bernstein	Charlotte, NC	178	\$500.00	\$425.00	\$450.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Patton Boggs	Washington, DC	485	\$780.00	\$480.00	\$665.00	\$475.00	\$325.00	\$405.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Paul Hastings	New York, NY	899	\$900.00	\$750.00	\$815.00	\$755.00	\$335.00	\$540.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Paul, Weiss, Rifkind, Wharton & Garrison	New York, NY	808	\$1120.00	\$760.00	\$1040.00	\$760.00	\$250.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Pepper Hamilton	Philadelphia, PA	493	\$850.00	\$475.00	\$650.00	\$460.00	\$245.00	\$360.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Perkins Coie	Seattle, WA	823	\$940.00	\$320.00	\$600.00	\$595.00	\$215.00	\$405.00	\$965.00	\$270.00	\$790.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Pillsbury Winthrop Shaw Pittman	Washington, DC	609	\$1070.00	\$615.00	\$965.00	\$360.00	\$375.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Polsinelli	Kansas City, MO	573	\$750.00	\$320.00	\$410.00	\$340.00	\$220.00	\$265.00	\$370.00	\$300.00	\$425.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Proskauer Rose	New York, NY	146	\$850.00	\$725.00	\$880.00	\$675.00	\$295.00	\$465.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Quarles & Brady	Milwaukee, WI	413	\$600.00	\$350.00	\$470.00	\$600.00	\$210.00	\$335.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Quinn Emanuel Urquhart & Sullivan	New York, NY	697	\$1075.00	\$810.00	\$915.00	\$675.00	\$320.00	\$410.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Reed Smith	Pittsburgh, PA	1468	\$945.00	\$545.00	\$710.00	\$530.00	\$285.00	\$420.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Richards, Layton & Finger	Wilmington, DE	138	\$950.00	\$475.00	\$660.00	\$450.00	\$250.00	\$330.00	\$465.00	\$450.00	\$475.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Riker Danzig Scherer Hyland & Perretti	Morristown, NJ	151	\$465.00	\$430.00	\$455.00	\$295.00	\$210.00	\$250.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Robinson & Cole	Hartford, CT	209	\$480.00	\$285.00	\$410.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Rutan & Tucker	Costa Mesa, CA	136	\$975.00	\$345.00	\$490.00	\$500.00	\$230.00	\$320.00	\$490.00	\$435.00	\$575.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Saul Ewing	Philadelphia, PA	226	\$850.00	\$365.00	\$530.00	\$675.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Sedgwick	San Francisco, CA	347	\$513.00	\$205.00	\$425.00	\$475.00	\$280.00	\$325.00	\$450.00	\$350.00	\$560.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Seward & Kissel	New York, NY	152	\$650.00	\$225.00	\$735.00	\$600.00	\$290.00	\$400.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Seyfarth Shaw	Chicago, IL	759	\$660.00	\$375.00	\$510.00	\$505.00	\$225.00	\$355.00	\$470.00	\$245.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Sheppard, Mullin, Richter & Hampton	Los Angeles, CA	521	\$875.00	\$490.00	\$695.00	\$535.00	\$275.00	\$415.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Shumaker, Loop & Kendrick	Toledo, OH	226	\$585.00	\$295.00	\$405.00	\$335.00	\$175.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Shutts & Bowen	Miami, FL	221	\$660.00	\$250.00	\$430.00	\$345.00	\$185.00	\$260.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Steadlen, Arns, Slate, Meagher & Flom	New York, NY	1735	\$1150.00	\$645.00	\$1035.00	\$845.00	\$340.00	\$620.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Snell & Wilmer	Phoenix, AZ	422	\$695.00	\$295.00	\$465.00	\$420.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Squire Sanders	Cleveland, OH	1257	\$950.00	\$350.00	\$655.00	\$500.00	\$250.00	\$355.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stevens & Lee	Reading, PA	167	\$800.00	\$525.00	\$625.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stinson Morrison Hecker	Kansas City, MO	280	\$595.00	\$290.00	\$475.00	\$550.00	\$185.00	\$280.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350
2013 Stoel Rives	Portland, OR	371	\$690.00	\$320.00	\$475.00	\$425.00	\$190.00	\$280.00	\$410.00	\$320.00	\$550.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350

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2013 Strasburger & Price	Dallas, TX	208	\$770.00	\$225.00	\$420.00	\$450.00	\$215.00	\$280.00	\$445.00	\$225.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Tax, Stettinius & Hollister	Cincinnati, OH	303	\$535.00	\$285.00	\$415.00	\$475.00	\$200.00	\$285.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Thompson & Knight	Dallas, TX	281	\$740.00	\$425.00	\$555.00	\$610.00	\$240.00	\$370.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Thompson Coburn	St. Louis, MO	365	\$610.00	\$330.00	\$440.00	\$350.00	\$220.00	\$270.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Trouman Sanders	Atlanta, GA	576	\$975.00	\$400.00	\$620.00	\$570.00	\$245.00	\$340.00	\$510.00	\$325.00	\$675.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Ulmer & Berne	Cleveland, OH	178	\$415.00	\$315.00	\$380.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Varnum	Grand Rapids, MI	134	\$455.00	\$280.00	\$360.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Venable	Washington, DC	501	\$1075.00	\$470.00	\$660.00	\$575.00	\$285.00	\$430.00	\$655.00	\$435.00	\$810.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Vinson & Elkins	Houston, TX	677	\$770.00	\$475.00	\$600.00	\$555.00	\$275.00	\$350.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Walter Lansden Dortch & Davis	Nashville, TN	165	\$800.00	\$350.00	\$460.00	\$335.00	\$180.00	\$245.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Weil, Gotshal & Manges	New York, NY	1201	\$1075.00	\$625.00	\$930.00	\$790.00	\$360.00	\$600.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 White & Case	New York, NY	1900	\$1050.00	\$700.00	\$875.00	\$1050.00	\$220.00	\$525.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

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2013 Wiley Rein	Washington, DC	272	\$950.00	\$550.00	\$665.00	\$535.00	\$520.00	\$445.00	\$580.00	\$380.00	\$600.00	National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Williams Mullen	Richmond, VA	231	\$410.00	\$360.00	\$385.00	\$350.00	\$280.00	\$295.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Wilkie Farr & Gallagher	New York, NY	540	\$1080.00	\$790.00	\$650.00	\$780.00	\$350.00	\$580.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Wilmer Cutler Pickering Hale and Dorr	Washington, DC	961	\$1250.00	\$735.00	\$905.00	\$695.00	\$75.00	\$290.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Winston & Strawn	Chicago, IL	842	\$995.00	\$650.00	\$600.00	\$590.00	\$425.00	\$520.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Wolff & Samson	West Orange, NJ	129	\$450.00	\$325.00	\$400.00	\$450.00	\$225.00	\$340.00				National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.
2013 Wyatt, Tarrant & Combs	Louisville, KY	165	\$500.00	\$280.00	\$418.00							National Law Journal, December 2013	Full-time equivalent attorney numbers and the largest U.S. office are from the NLJ 350 published in April 2013.

# EXHIBIT 10

5:07 PM

03/06/17

Cash Basis

**Console Mattiacci Law, LLC**  
**Custom Transaction Detail Report**  
**All Transactions**

Date	Name	Source Name	Memo	Paid Amount
01/23/2013	Braden, Robert K.	Intercept Delivery Service	1/9/13 to EEOC	10.75
03/12/2014	Braden, Robert K.	Intercept Delivery Service	3/5/14 to EEOC	6.75
08/02/2014	Braden, Robert K.	American Express	7/2/14 complaint filing	400.00
05/06/2015	Braden, Robert K.	Federal Express	4/30/15 to client	18.45
07/29/2015	Braden, Robert K.	James M. Duttera	6/25/15 - mileage to/from dep in Princeton	44.92
08/10/2015	Braden, Robert K.	Terry Burke	7/14/15 Dep of Renna & 7/16/15 Dep of Kebalo	1,204.05
08/10/2015	Braden, Robert K.	Magna Legal Services	7/23/15 Dep of Gillespie	1,109.65
08/19/2015	Braden, Robert K.	Magna Legal Services	7/23/15 Gillespie (Magna Legal Vision)	285.00
08/19/2015	Braden, Robert K.	Magna Legal Services	7/23/15 Gillespie (video)	1,155.00
09/16/2015	Braden, Robert K.	Pirozzi & Hillman, Inc.	6/25/15 Dep of client	891.10
10/12/2015	Braden, Robert K.	Clerk, USDC NJ	RM Pro Hac Vice	150.00
11/02/2015	Braden, Robert K.	Terry Burke	10/19/15 dep of Kebalo	244.50
01/06/2016	Braden, Robert K.	Lexis-Nexis	Dec 2015 Lexis research	12.82
01/20/2016	Braden, Robert K.	PACER	PACER research Oct-Dec 2015	0.10
02/02/2016	Braden, Robert K.	Federal Express	12/7/15 to JMD	19.23
06/21/2016	Braden, Robert K.	Intercept Delivery Service	6/6/16 to Camden County Courthouse	43.49
06/21/2016	Braden, Robert K.	Lexis-Nexis	May 2016 Lexis research	16.72
07/27/2016	Braden, Robert K.	Lexis-Nexis	June 2016 Lexis research charges	17.13
07/27/2016	Braden, Robert K.	PACER	PACER records 4/1/16-6/30/16	6.20
10/17/2016	Braden, Robert K.	PACER	PACER research July-Sept 2016	0.80
12/05/2016	Braden, Robert K.	Lexis-Nexis	Nov 2016 Lexis research	1.41
01/24/2017	Braden, Robert K.	PACER	PACER research Oct-Dec 2016	0.70
01/24/2017	Braden, Robert K.	Cheryl A. Weaver	1/10/17 parking/file transfer	17.00
01/24/2017	Braden, Robert K.	Road Runner Courier Agency, Inc.	1/9/17 to Judge Bumb	34.95
01/24/2017	Braden, Robert K.	Road Runner Courier Agency, Inc.	1/5/17 to Clerk of Superior Court	34.95
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/23/17 trial team - meals	32.44
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/24/17 trial team - meals	44.66
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/25/17 trial team - meals	7.74
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/25/17 trial team - meals	18.78
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/26/17 trial team - meals	26.29
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/19/17 parking for trial	12.00
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/23-1/26/17 parking	70.00
02/01/2017	Braden, Robert K.	Cheryl A. Weaver	1/23-1/26/17 mileage to/from trial	96.30
02/01/2017	Braden, Robert K.	Theodore M. Formaroli, CSR, CRR	Trial transcripts	4,371.99
02/01/2017	Braden, Robert K.	Intercept Delivery Service	1/20/17 to NJ office	120.80
02/01/2017	Braden, Robert K.	Charlene Bates	1/23-1/26/17 mileage for trial	69.00
02/01/2017	Braden, Robert K.	Charlene Bates	1/23-1/26/17 parking for trial	40.00
02/01/2017	Braden, Robert K.	Charlene Bates	1/19/17 parking for tech run for trial	22.00
02/01/2017	Braden, Robert K.	Charlene Bates	1/19/17 bridge toll - trial	5.00
02/01/2017	Braden, Robert K.	Charlene Bates	1/26/17 parking for trail (Phila office)	30.00
02/06/2017	Braden, Robert K.	Intercept Delivery Service	1/23/17 to USDC NJ	81.74
02/06/2017	Braden, Robert K.	Intercept Delivery Service	1/24/17 to USDC NJ	52.94
02/06/2017	Braden, Robert K.	Intercept Delivery Service	1/26/17 from USDC NJ to Phila office	189.74
02/06/2017	Braden, Robert K.	Relx Inc. DBA LexisNexis	Jan 2017 Lexis research	378.25
02/06/2017	Braden, Robert K.	Emily Derstine Friesen	1/22-1/26/17 PATCO to DNJ	5.60
02/06/2017	Braden, Robert K.	Rahul Munshi	1/23/17 car rental for trial	227.24
02/06/2017	Braden, Robert K.	Rahul Munshi	1/23-1/25/17 meals (trial)	21.59
02/06/2017	Braden, Robert K.	Rahul Munshi	1/22-1/27/17 parking (trial)	220.00
02/06/2017	Braden, Robert K.	Rahul Munshi	1/23/17 tolls (trial)	20.00
02/27/2017	Braden, Robert K.	Logic Choice Business Technologies	1/23/17 Trial Courtroom Tech Assistance	1,000.00
02/27/2017	Braden, Robert K.	Logic Choice Business Technologies	1/24/17 Trial Courtroom Tech Assistance	1,000.00
02/27/2017	Braden, Robert K.	Logic Choice Business Technologies	1/25/17 Trial Courtroom Tech Assistance	1,000.00
02/27/2017	Braden, Robert K.	Logic Choice Business Technologies	1/26/17 Trial Courtroom Tech Assistance	1,000.00
02/27/2017	Braden, Robert K.	Logic Choice Business Technologies	1/19/17 Trial Support Tech run	262.50
<b>Total</b>				<b>16,152.27</b>



# **EXHIBIT 11**

**CONTINGENCY FEE AGREEMENT**  
**New Jersey**

Firm	<b>Console Law Offices LLC</b>
Name of Attorney	<b>Stephen G. Console, Esquire</b>
Address of Attorney	<b>1525 Locust Street, 9th Fl. 110 Marter Avenue</b> <b>Philadelphia, PA 19102 Suite 105</b> <b>(215)545-7676 Moorestown, NJ 08057</b> <b>(856) 854-4000</b>
Name of Client	<b>Robert K. Braden</b>
Address of Client	<b>126 Righters Mill Road</b> <b>Penn Valley, PA 19072</b>
Telephone Number	<b>610.667.4933 (h)</b>
Email	<b>RKBraden@excite.com</b>

1. I, **Robert K. Braden**, hereby constitute and appoint **Console Law Offices LLC**, as my attorneys to represent me with respect to my claims of age discrimination against **Lockheed Martin** in connection with my termination, of which I received notice on July 10, 2012.
2. Although I have been advised of the right to retain my attorney under an arrangement whereby I would compensate my attorney on the basis of the reasonable value of his/her services, I agree that my attorney shall be paid a fee, contingent in whole or in part, of forty (40%) percent out of the net verdict, settlement or award obtained. The percentage is calculated on the total amount of the verdict, settlement or award obtained, including attorney's fees but less costs and is based on pre-tax dollars.
3. In the event there is a court award of attorney's fees or a settlement with certain monies being paid as attorney's fees, I agree that my attorney shall be entitled to the amount of attorney's fees so awarded or the amount of the contingency fee of the entire award or settlement, inclusive of attorneys' fees, as set forth above, whichever is greater.
4. I agree that if, without the consent of my attorney, I settle my case without my attorney receiving a fee that is equivalent to his fee in the case if paid on an hourly basis (at 2012 rates, as follows: a rate of \$760 per hour for the services of Carol A. Mager, Esquire; a rate of \$680 per hour for the services of Stephen G. Console, Esquire; a rate of \$560 per hour for the services of Marjory P. Albee, Esquire; a rate of \$500 per hour for the services of Susan M. Saint-Antoine, Esquire; a rate of \$500 per hour for the services of Laura C. Mattiacci, Esquire; a rate of \$300 per hour for the services of James M. Duttera, Esquire; a rate of \$300 per hour for the services of Caren N. Gurmankin, Esquire; a rate of \$220 per hour for the services of Rahul Munshi, Esquire; a rate of \$190 per hour for the services of Anna Oppenheim, Esquire; a rate of \$175 per hour for the services of Cheryl Weaver, Paralegal; a rate of \$75 per hour for any work performed by other Paralegals; and, a rate of \$100 per hour for any work performed by any law clerk)\*, I am responsible for the difference in the fee amounts to my attorney. If additional employees of Console Law Offices LLC work on my file, I agree to pay their reasonable billing rates.  
\*These rates are subject to reasonable increases effective January 1 of each year.

5. I realize that, in the event of a recovery, I am fully responsible for all costs incurred including filing fees, travel expenses, deposition and appeal costs. These costs are to be paid from any recovery I receive. However, if the gross recovery is \$150,000 or less, attorney fees shall be adjusted so that costs plus attorney fees shall not exceed fifty (50%) of the total recovery.
6. I acknowledge that there have not been any promises or guarantees made concerning the outcome of this action or litigation.
7. In the event there is no recovery, except as may otherwise be specified above, I shall not be obligated to pay a fee for attorney services or for any costs incurred.
8. The above contingent fee shall be computed on the net recovery arrived at by deducting from the gross recovery all disbursements in connection with the institution and prosecution of the claim, including investigation expenses, expenses for expert or other testimony or evidence, the cost of briefs and transcripts on appeal, and any interest included in a judgment pursuant to R.4:42-11(b). The fee shall include legal services rendered on any appeal, review proceeding or retrial, but this shall not be deemed to require the attorney to take an appeal or pursue a review.
9. I hereby give my consent for my attorney to communicate concerning my case via electronic mail.
10. I understand that I should not destroy or alter any paper or electronic files which relate to my claims or the claims brought against me. This includes not only hard copy paper but also data generated by and/or stored on my computer systems and storage media (e.g., hard disks, floppy disks, backup tapes). Examples are electronic communications; word processing documents; spreadsheets; database; calendars; telephone logs; offline storage or information stored on removable media; information contained on laptops or other portable devices. I understand that if I need assistance in determining how to retain this information, Console Law Offices will provide guidance. Even if paper copy exists, I understand that I should not destroy the electronic form. I understand that I should discontinue programs on my computer or elsewhere that automatically destroy data. This direction applies both to data created prior to this date and future data. I understand that failure to take reasonable steps to avoid the destruction of evidence could adversely affect my claims.
11. I understand, and agree to, the litigation team approach used by Console Law Offices wherein an attorney may be lead trial attorney in trying my case to verdict even though he/she has not been directly involved in the discovery or negotiation process.

Dated: 11/30/2012

  
Robert K. Braden

Dated: 12/4/12

By:   
Stephen G. Console, Esquire  
Console Law Offices LLC